

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Fort Wayne Foundry Corp. - Pontiac Street Division
2509 East Pontiac Street
Fort Wayne, Indiana 46803**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T003-6027-00070	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary secondary aluminum metal production facility, which is one of the 28 listed source categories, pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

Responsible Official:	Mr. Curt French, Vice President - Foundry Operations
Source Address:	2509 East Pontiac Street, Fort Wayne, Indiana 46803
Mailing Address:	2509 East Pontiac Street, Fort Wayne, Indiana 46803
Phone Number:	Kathy McCrudden - (219) 483-0382
SIC Code:	3365
County Location:	Allen
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) the scrap and charge handling process, constructed in 1976, with a maximum charge rate of 9.75 tons of aluminum ingots and scrap per hour, with emissions uncontrolled;
- (2) the aluminum melting process, consisting of the following:
 - (a) one (1) natural gas-fired reverberatory furnace system, identified as Disa #1/2, emission unit FD-1/2, constructed in 1986, with a maximum charge rate of 4.25 tons per hour of aluminum ingots and scrap, and with a maximum production rate of 4.25 tons of melted aluminum per hour, with emissions uncontrolled, and exhausting through stacks D2 and D10;
 - (b) one (1) natural gas-fired reverberatory furnace system, identified as Hunter #1, emission unit FH-1, constructed in 1990, with a maximum charge rate of 1.75 tons per hour of aluminum ingots and scrap, and with a maximum production rate of 1.75 tons of melted aluminum per hour, with emissions uncontrolled, and exhausting through stacks H8, H11, and H22;
 - (c) one (1) natural gas-fired reverberatory furnace system, identified Hunter #2, emission unit FH-2, constructed in 1992, with a maximum charge rate of 1.5 tons per hour of aluminum ingots and scrap, and with a maximum production rate of 1.5 tons of melted aluminum per hour, with emissions uncontrolled, and exhausting through stacks H8, H11, and H22;

- (d) one (1) natural gas-fired reverberatory furnace system, identified Hunter #3, emission unit FH-3, constructed in 1995, with a maximum charge rate of 2.25 tons per hour of aluminum ingots and scrap, and with a maximum production rate of 2.25 tons of melted aluminum per hour, with emissions uncontrolled, and exhausting through stacks H8, H11, and H22.
- (3) the Hunter #1 pouring, cooling, and shakeout processes, consisting of the following:
 - (a) one (1) pouring system, identified as Hunter #1, emission unit H-1, constructed in 1981, with a maximum capacity of 2.25 tons of melted aluminum per hour and a maximum capacity of 33.75 tons of sand per hour, with emissions uncontrolled, and exhausting to stack H30;
 - (b) one (1) cooling system, identified as Hunter #1, emission unit H-1, constructed in 1981, with a maximum capacity of 2.25 tons of melted aluminum per hour and a maximum capacity of 33.75 tons of sand per hour, with emissions controlled by baghouse CD-1, and exhausting to stack CD-1;
 - (c) one (1) castings shakeout knockout system, identified as Hunter #1, emission unit H-1, constructed in 1981, with a maximum capacity of 2.25 tons of melted aluminum per hour and a maximum capacity of 33.75 tons of sand per hour, with emissions controlled by baghouse CD-1, and exhausting to stack CD-1;
- (4) the Hunter #2 pouring, cooling, and shakeout processes, consisting of the following:
 - (a) one (1) pouring system, identified as Hunter #2, emission unit H-2, constructed in 1977, with a maximum capacity of 2.25 tons of melted aluminum per hour and a maximum capacity of 33.75 tons of sand per hour, with emissions uncontrolled, and exhausting to stack H30;
 - (b) one (1) cooling system, identified as Hunter #2, emission unit H-2, constructed in 1977, with a maximum capacity of 2.25 tons of melted aluminum per hour and a maximum capacity of 33.75 tons of sand per hour, with emissions controlled by baghouse CD-1, and exhausting to stack CD-1;
 - (c) one (1) castings shakeout knockout system, identified as Hunter #2, emission unit H-2, constructed in 1977, with a maximum capacity of 2.25 tons of melted aluminum per hour and a maximum capacity of 33.75 tons of sand per hour, with emissions controlled by baghouse CD-1, and exhausting to stack CD-1;
- (5) the Disa pouring, cooling, and shakeout processes, consisting of the following:
 - (a) one (1) pouring system, identified as Disa #1, emission unit D-1, constructed in 1986, with a maximum capacity of 4.25 tons of melted aluminum per hour and a maximum capacity of 63.75 tons of sand per hour, with emissions uncontrolled, and exhausting to stack RV;
 - (b) one (1) cooling system, identified as Disa #1, emission unit D-1, constructed in 1986, with a maximum capacity of 4.25 tons of melted aluminum per hour and a maximum capacity of 63.75 tons of sand per hour, with emissions uncontrolled, and exhausting internally;

- (c) one (1) castings shakeout knockout system, identified as Disa #1, emission unit D-1, constructed in 1986, with a maximum capacity of 4.25 tons of melted aluminum per hour and a maximum capacity of 63.75 tons of sand per hour, with emissions uncontrolled, and exhausting internally;
- (6) one (1) sand handling system, consisting of the following:
 - (a) one sand muller, identified as SM-1, constructed in 1977, with a maximum capacity of 90 tons of sand per hour, controlled by baghouse CD1, and exhausting through stack CD1;
 - (b) sand conveying and screening, identified as SS-1, constructed in 1977, with a maximum capacity of 90 tons of sand per hour, controlled by baghouse CD1, and exhausting through stack CD1;
- (7) the core making process, consisting of nine (9) core making machines, identified as CM-1 through CM-9, constructed in 1986, 1986, 1987, 1990, 1991, 1994, 1994, 1995, and 1998, respectively, each with a maximum capacity of 0.75 ton of sand per hour, all uncontrolled and exhausting through stacks C5 and C6.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including one (1) parts washer, constructed in 1991; [326 IAC 8-3-2] [326 IAC 8-3-5]
- (2) Shotblasting operations including the following:
 - (a) one (1) Spinablast III shotblast machine, constructed in 1995, with a maximum capacity of 2 tons of aluminum castings per hour, controlled by a baghouse, designated as CD3; [326 IAC 6-3-2]
 - (b) one (1) Wheelabrator blast machine, referred to as Wheelabrator I, constructed in 1987, with a maximum capacity of 1 ton of aluminum castings per hour, controlled by a baghouse, designated as CD4; [326 IAC 6-3-2] and
 - (c) the pattern woodworking shop controlled by a baghouse. [326 IAC 6-3-2]
- (3) the finishing, grinding, and cutoff operations constructed in 1976 including the following:
 - (a) one (1) Hunter dual 3" belt grinder, referred to as HGF1, controlled by baghouse CD7; [326 IAC 6-3-2]
 - (b) one (1) Hunter dual 3" belt grinder, referred to as HGF2, controlled by baghouse CD6; [326 IAC 6-3-2]
 - (c) one (1) Hunter dual 24" belt grinder, referred to as HGF3, controlled by baghouse CD5; [326 IAC 6-3-2]

- (d) one (1) Hunter chopsaw;[326 IAC 6-3-2]
- (e) one (1) Hunter hydraulic punch;[326 IAC 6-3-2]
- (f) two (2) Hunter hydraulic presses;[326 IAC 6-3-2]
- (g) three (3) Hunter process belts;[326 IAC 6-3-2]
- (h) three (3) leak testers;[326 IAC 6-3-2]
- (i) one Disa oscillating circular conveyor;[326 IAC 6-3-2]
- (j) three (3) Disa bandsaws;[326 IAC 6-3-2]
- (k) two (2) Disa dual 3" belt grinders;[326 IAC 6-3-2]
- (l) one (1) Disa 24" belt grinder, referred to as DGF2;[326 IAC 6-3-2]
- (m) two (2) Disa hydraulic presses; [326 IAC 6-3-2] and
- (n) one (1) Disa process belt.[326 IAC 6-3-2]
- (4) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.[326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

GENERAL CONDITIONS

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

- ## B.2 Definitions [326 IAC 2-7-1]

B.3 Permit Term [326 IAC 2-7-5(2)]

B.4 Enforceability [326 IAC 2-7-7(a)]

- ## B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

B.6 Severability [326 IAC 2-7-5(5)]

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM, . IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
 - (2) If IDEM, OAM, , upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, , takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, , any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any approval required by 326 IAC 2-1.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
- (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (i) A brief description of the change within the source;
 - (ii) The date on which the change will occur;
 - (iii) Any change in emissions; and
 - (iv) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the

certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The

application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.26 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 if such modifications occur during the term of this permit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Stack Height [326 IAC 1-7]
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

-
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on September 22, 1998.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.

[326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM, . The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been

predicted.

- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in

any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.26 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] the scrap and charge handling process, constructed in 1976, with a maximum charge rate of 9.75 tons of aluminum ingots and scrap per hour, with emissions uncontrolled.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the scrap and charge handling process shall not exceed 18.85 pounds per hour when operating at a process weight rate of 9.75 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] the aluminum melting process, consisting of the following:

- (a) one (1) natural gas-fired reverberatory furnace system, identified as Disa #1/2, emission unit FD-1/2, constructed in 1986, with a maximum charge rate of 4.25 tons per hour of aluminum ingots and scrap, and with a maximum production rate of 4.25 tons of melted aluminum per hour, with emissions uncontrolled, and exhausting through stacks D2 and D10;
- (b) one (1) natural gas-fired reverberatory furnace system, identified as Hunter #1, emission unit FH-1, constructed in 1990, with a maximum charge rate of 1.75 tons per hour of aluminum ingots and scrap, and with a maximum production rate of 1.75 tons of melted aluminum per hour, with emissions uncontrolled, and exhausting through stacks H8, H11, and H22;
- (c) one (1) natural gas-fired reverberatory furnace system, identified Hunter #2, emission unit FH-2, constructed in 1992, with a maximum charge rate of 1.5 tons per hour of aluminum ingots and scrap, and with a maximum production rate of 1.5 tons of melted aluminum per hour, with emissions uncontrolled, and exhausting through stacks H8, H11, and H22;
- (d) one (1) natural gas-fired reverberatory furnace system, identified Hunter #3, emission unit FH-3, constructed in 1995, with a maximum charge rate of 2.25 tons per hour of aluminum ingots and scrap, and with a maximum production rate of 2.25 tons of melted aluminum per hour, with emissions uncontrolled, and exhausting through stacks H8, H11, and H22.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 not applicable, the following conditions shall apply:

- (a) The PM emissions from each of the Disa furnaces shall not exceed 0.50 pound per ton of metal melted. This limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations).
- (b) The PM emissions from the Hunter #1 furnace shall not exceed 3.13 pounds per ton of metal melted. This limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations).
- (c) The PM10 emissions from the Hunter #1 furnace shall not exceed 1.83 pounds per ton of metal melted.
- (d) The PM emissions from the Hunter #2 furnace shall not exceed 3.65 pounds per ton of metal melted. This limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations).
- (e) The PM10 emissions from the Hunter #2 furnace shall not exceed 2.13 pounds per ton of metal melted.

- (f) The PM emissions from the Hunter #3 furnace shall not exceed 2.44 pounds per ton of metal melted. This limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations).
- (g) The PM10 emissions from the Hunter #3 furnace shall not exceed 1.42 pounds per ton of metal melted.
- (h) The maximum amount of post-consumer scrap charged to each of the furnaces shall be limited to the amount of post-consumer scrap charged to each of the furnaces during the stack test. This amount shall be determined as a weight percent of the total charge. Until the stack tests have been conducted the maximum amount of post-consumer scrap charged to each of the furnaces shall not exceed 20% of the total charge to each of the furnaces.

Therefore, the requirements of 326 IAC 2-2 and 40 CFR 52.21 shall not apply.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 180 days after issuance of this permit, the Permittee shall perform PM testing on each of the Disa furnace systems, using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.2.1. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations

- (a) Visible emission notations of each of the furnace stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.1(h), the Permittee shall maintain records of the amount of post consumer scrap charged to each of the furnaces every four hours (as a weight percent of the total charge to each furnace during that four hour time period).
 - (b) To document compliance with Condition D.2.4, the Permittee shall maintain records of visible emission notations of each of the furnace stack exhausts once per shift.
 - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

the Hunter #1 pouring, cooling, and shakeout processes, consisting of the following:

- (1) one (1) pouring system, identified as Hunter #1, emission unit H-1, constructed in 1981, with a maximum capacity of 2.25 tons of melted aluminum per hour and a maximum capacity of 33.75 tons of sand per hour, with emissions uncontrolled, and exhausting to stack H30;
- (2) one (1) cooling system, identified as Hunter #1, emission unit H-1, constructed in 1981, with a maximum capacity of 2.25 tons of melted aluminum per hour and a maximum capacity of 33.75 tons of sand per hour, with emissions controlled by baghouse CD-1, and exhausting to stack CD-1; and
- (3) one (1) castings shakeout knockout system, identified as Hunter #1, emission unit H-1, constructed in 1981, with a maximum capacity of 2.25 tons of melted aluminum per hour and a maximum capacity of 33.75 tons of sand per hour, with emissions controlled by baghouse CD-1, and exhausting to stack CD-1.

Note: Baghouse CD-1 controls the Hunter #1 cooling system, the Hunter #1 shakeout knockout system, the Hunter #2 cooling system, the Hunter #2 shakeout knockout system, and the sand handling system.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 not applicable, the following conditions shall apply:

- (a) The PM emissions from the Hunter #1 pouring operation shall not exceed 0.5 pound per ton of metal poured. This limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations).
- (b) The PM emissions from the Hunter #1 cooling operation shall not exceed 0.07 pound per ton of metal cooled after controls. This limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations).
- (c) The PM emissions from the Hunter #1 shakeout operation shall not exceed 2.66 pounds per hour. This limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations).

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 180 days after issuance of this permit, the Permittee shall perform PM testing on the pouring, cooling, and shakeout processes using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.3.1. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.3.4 Particulate Matter (PM)

The baghouse CD-1 for PM control shall be in operation and control emissions from the cooling and shakeout system at all times when the cooling, or shakeout system is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.5 Visible Emissions Notations

- (a) Visible emission notations of the baghouse CD-1 stack exhaust and of the pouring stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the cooling and shakeout processes, at least once daily when the cooling and shakeout processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every twelve (12) months.

D.3.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the cooling and shakeout processes when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.3.8 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.9 Record Keeping Requirements

- (a) To document compliance with Condition D.3.5, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhaust.
- (b) To document compliance with Condition D.3.6, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and Compliance Response logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
- (c) To document compliance with Condition D.3.7, the Permittee shall maintain records of the results of the inspections required under Condition D.3.7.

- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

the Hunter #2 pouring, cooling, and shakeout processes, consisting of the following:

- (1) one (1) pouring system, identified as Hunter #2, emission unit H-2, constructed in 1977, with a maximum capacity of 2.25 tons of melted aluminum per hour and a maximum capacity of 33.75 tons of sand per hour, with emissions uncontrolled, and exhausting to stack H30;
- (2) one (1) cooling system, identified as Hunter #2, emission unit H-2, constructed in 1977, with a maximum capacity of 2.25 tons of melted aluminum per hour and a maximum capacity of 33.75 tons of sand per hour, with emissions controlled by baghouse CD-1, and exhausting to stack CD-1; and
- (3) one (1) castings shakeout knockout system, identified as Hunter #2, emission unit H-2, constructed in 1977, with a maximum capacity of 2.25 tons of melted aluminum per hour and a maximum capacity of 33.75 tons of sand per hour, with emissions controlled by baghouse CD-1, and exhausting to stack CD-1.

Note: Baghouse CD-1 controls the Hunter #1 cooling system, the Hunter #1 shakeout knockout system, the Hunter #2 cooling system, the Hunter #2 shakeout knockout system, and the sand handling system.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 not applicable, the following conditions shall apply:

- (a) The PM emissions from the Hunter #2 pouring operation shall not exceed 0.5 pound per ton of metal poured. This limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations).
- (b) The PM emissions from the Hunter #2 cooling operation shall not exceed 0.07 pound per ton of metal cooled after controls. This limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations).
- (c) The PM emissions from the Hunter #2 shakeout operation shall not exceed 2.66 pounds per hour. This limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations).

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 180 days after issuance of this permit, the Permittee shall perform PM testing on the pouring, cooling, and shakeout processes using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.4.1. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.4.4 Particulate Matter (PM)

The baghouse CD-1 for PM control shall be in operation at all times and control emissions from the cooling and shakeout system when the cooling, or shakeout system is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.5 Visible Emissions Notations

- (a) Visible emission notations of the baghouse CD-1 stack exhaust and of the pouring stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.4.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the cooling and shakeout processes, at least once daily when the cooling and shakeout processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every twelve (12) months.

D.4.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the cooling and shakeout processes when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.4.8 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.9 Record Keeping Requirements

- (a) To document compliance with Condition D.4.5, the Permittee shall maintain records of visible emission notations of the baghouse stack exhaust once per shift.
- (b) To document compliance with Condition D.4.6, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and Compliance Response logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
- (c) To document compliance with Condition D.4.7, the Permittee shall maintain records of the results of the inspections required under Condition D.4.7.

- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

the Disa pouring, cooling, and shakeout processes, consisting of the following:

- (1) one (1) pouring system, identified as Disa #1, emission unit D-1, constructed in 1986, with a maximum capacity of 4.25 tons of melted aluminum per hour and a maximum capacity of 63.75 tons of sand per hour, with emissions uncontrolled, and exhausting to stack RV;
- (2) one (1) cooling system, identified as Disa #1, emission unit D-1, constructed in 1986, with a maximum capacity of 4.25 tons of melted aluminum per hour and a maximum capacity of 63.75 tons of sand per hour, with emissions uncontrolled, and exhausting internally;
- (3) one (1) castings shakeout knockout system, identified as Disa #1, emission unit D-1, constructed in 1986, with a maximum capacity of 4.25 tons of melted aluminum per hour and a maximum capacity of 63.75 tons of sand per hour, with emissions uncontrolled, and exhausting to stack RV.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 not applicable, the following conditions shall apply:

- (a) The PM emissions from the Disa pouring operation shall not exceed 0.5 pound per ton of metal poured. This limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations).
- (b) The PM emissions from the Disa cooling operation shall not exceed 1.0 pound per ton of metal cooled. This limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations).
- (c) The PM emissions from the Disa shakeout operation shall not exceed 13.6 pounds per hour. This limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations).

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 180 days after issuance of this permit, the Permittee shall perform PM testing on the pouring, cooling, and shakeout processes using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.5.1. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the

facility is in compliance.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.4 Visible Emissions Notations

- (a) Visible emission notations of the Disa pouring, cooling, and shakeout stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.5 Record Keeping Requirements

- (a) To document compliance with Condition D.5.4, the Permittee shall maintain records of visible emission notations of the baghouse stack exhaust once per shift.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.6

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

one (1) sand handling system, consisting of the following:

- (1) one sand muller, identified as SM-1, constructed in 1977, with a maximum capacity of 90 tons of sand per hour, controlled by baghouse CD1, and exhausting through stack CD1; and
- (2) sand conveying and screening, identified as SS-1, constructed in 1977, with a maximum capacity of 90 tons of sand per hour, controlled by baghouse CD1, and exhausting through stack CD1.

Note: Baghouse CD-1 controls the Hunter #1 cooling system, the Hunter #1 shakeout knockout system, the Hunter #2 cooling system, the Hunter #2 shakeout knockout system, and the sand handling system.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 not applicable, the PM emissions from the baghouse controlling the sand handling system shall not exceed 2.59 pounds per hour. Compliance with this limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations). Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 180 days after issuance of this permit, the Permittee shall perform PM testing using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.6.1. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.6.4 Particulate Matter (PM)

The baghouse CD-1 for PM control shall be in operation and control emissions from the sand handling system at all times when the sand handling system is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.5 Visible Emissions Notations

- (a) Visible emission notations of the baghouse CD-1 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.6.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the sand handling process, at least once daily when the sand handling process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every twelve (12) months.

D.6.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the sand handling operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.6.8 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.9 Record Keeping Requirements

- (a) To document compliance with Condition D.6.5, the Permittee shall maintain records of visible emission notations of the baghouse stack exhaust once per shift.
- (b) To document compliance with Condition D.6.6, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and Compliance Response logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
- (c) To document compliance with Condition D.6.7, the Permittee shall maintain records of the results of the inspections required under Condition D.6.7.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.7

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

nine (9) core making machines, identified as CM-1 through CM-9, constructed in 1986, 1986, 1987, 1990, 1991, 1994, 1994, 1995, and 1998, respectively, each with a maximum capacity of 0.75 ton of sand per hour, all uncontrolled and exhausting through stacks C5 and C6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 not applicable, the following conditions shall apply:

- (a) The combined binder usage for Isocure core machines ISO-1, ISO-2, and ISO-3 shall be limited to 186.59 tons per 12 consecutive month period.
- (b) The VOC emissions from Isocure core machines ISO-1, ISO-2, and ISO-3 shall not exceed 39.87 pounds per hour.
- (c) The combined binder usage for Isocure core machines ISO-6, ISO-7, and ISO-8 shall be limited to 181.77 tons per 12 consecutive month period.
- (d) The VOC emissions from Isocure core machines ISO-6, ISO-7, and ISO-8 shall not exceed 39.84 pounds per hour.

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

D.7.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.7.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However IDEM may require compliance testing when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.4 Record Keeping Requirements

- (a) To document compliance with Condition D.7.1 (a), the Permittee shall maintain records of the combined binder usage for Isocure core machines ISO-1, ISO-2, and ISO-3 each month.
- (b) To document compliance with Condition D.7.1 (c), the Permittee shall maintain records of the combined binder usage for Isocure core machines ISO-6, ISO-7, and ISO-8 each month.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.7.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.7.1 (a) and (c) shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.8

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]	Insignificant Activity
Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including one (1) parts washer, constructed in 1991	
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)	

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.8.2 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.8.3 Hazardous Air Pollutants (HAPs)

Pursuant to the 40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning, Subpart T, the solvent used in the parts washers shall not contain any of the following halogenated solvents in concentrations greater than five percent by weight: methylene chloride, 1,1,1-trichloroethane, trichloroethylene, perchloroethylene, carbon tetrachloride, or chloroform. Therefore, the requirements of this NESHAP shall not apply.

SECTION D.9

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]	Insignificant Activity
(1) one (1) Spinablast III shotblast machine, constructed in 1995, with a maximum capacity of 2 tons of aluminum castings per hour, controlled by a baghouse, designated as CD3;	
(2) one (1) Wheelabrator blast machine, referred to as Wheelabrator I, constructed in 1987, with a maximum capacity of 1 ton of aluminum castings per hour, controlled by a baghouse, designated as CD4;	
(3) the pattern woodworking shop; and	
(4) the finishing, grinding, and cutoff operations constructed in 1976 including the following:	
(a) one (1) Hunter dual 3" belt grinder, referred to as HGF1, controlled by baghouse CD7;	
(b) one (1) Hunter dual 3" belt grinder, referred to as HGF2, controlled by baghouse CD6;	
(c) one (1) Hunter dual 24" belt grinder, referred to as HGF3, controlled by baghouse CD5;	
(d) one (1) Hunter chopsaw;	
(e) one (1) Hunter hydraulic punch;	
(f) two (2) Hunter hydraulic presses;	
(g) three (3) Hunter process belts;	
(h) three (3) leak testers;	
(i) one Disa oscillating circular conveyor;	
(j) three (3) Disa bandsaws;	
(k) two (2) Disa dual 3" belt grinders;	
(l) one (1) Disa 24" belt grinder, referred to as DGF2;	
(m) two (2) Disa hydraulic presses; and	
(n) one (1) Disa process belt.	
(5) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.	
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)	

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.9.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each of the above listed facilities shall not exceed the pounds per hour as calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.9.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.9.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.9.3 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times and control emissions from the corresponding emission units when the corresponding emissions units are in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Fort Wayne Foundry - Pontiac Division, Inc.
Source Address: 2509 East Pontiac Street, Fort Wayne, Indiana 46803
Mailing Address: 2509 East Pontiac Street, Fort Wayne, Indiana 46803
Part 70 Permit No.: T 003-6027-00070

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Fort Wayne Foundry - Pontiac Division, Inc.
Source Address: 2509 East Pontiac Street, Fort Wayne, Indiana 46803
Mailing Address: 2509 East Pontiac Street, Fort Wayne, Indiana 46803
Part 70 Permit No.: T 003-6027-00070

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C) C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Fort Wayne Foundry - Pontiac Division, Inc.
Source Address: 2509 East Pontiac Street, Fort Wayne, Indiana 46803
Mailing Address: 2509 East Pontiac Street, Fort Wayne, Indiana 46803
Part 70 Permit No.: T 003-6027-00070
Facility: Isocure core making machines
Parameter: binder usage (tons/month)
Limit: For ISO-1, ISO-2, and ISO-3 combined: 186.59 tons per 12 consecutive month period;
For ISO-6, ISO-7, and ISO-8 combined: 181.77 tons per 12 consecutive month period

YEAR: _____

Month	Core Machines	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
Month 1	1, 2, and 3			
Month 2	1, 2, and 3			
Month 3	1, 2, and 3			
Month 1	6, 7, and 8			
Month 2	6, 7, and 8			
Month 3	6, 7, and 8			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Fort Wayne Foundry - Pontiac Division, Inc.
Source Address: 2509 East Pontiac Street, Fort Wayne, Indiana 46803
Mailing Address: 2509 East Pontiac Street, Fort Wayne, Indiana 46803
Part 70 Permit No.: T 003-6027-00070

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Part 70 Operating Permit

Source Name: Fort Wayne Foundry Corp. - Pontiac Street Division
Source Location: 2509 East Pontiac Street, Fort Wayne, Indiana 46803
County: Allen
SIC Code: 3365
Operation Permit No.: T003-6027-00070
Permit Reviewer: Nisha Sizemore

On October 24, 1998, the Office of Air Management (OAM) had a notice published in the Fort Wayne Journal Gazette, Fort Wayne, Indiana, stating that Fort Wayne Foundry Corp. - Pontiac Street Division had applied for a Part 70 Operating Permit to operate a secondary aluminum production facility. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comment #1

We wish to reaffirm our position that our source should not be classified as a secondary metal production plant, and therefore should not be treated as one of the 28 listed source categories in our Title V permit. The use of the term "secondary metal production" has been based on three elements: (1) use of scrap metal from outside sources as the primary feedstock component; (2) smelting, refining, reduction, or alloying; (3) production and sale of the metal as a primary product, as opposed to castings or formed products with an intended function (i.e., sand or die-cast engine parts or extruded cable and pipe). Our operations do not meet any of these three specifications. We request that the statement in the TSD at State Rule Applicability - Entire Source, 326 IAC 2-2, indicating that this source is one of the 28 listed source categories (secondary metal production) be deleted from the document.

Response #1

Fort Wayne Foundry has provided information to OAM stating that as much as twenty percent (20%) of the feedstock material can be post-consumer scrap. It is the OAM's position that the use of post-consumer scrap as part of the feedstock material classifies the facility as a secondary metal production facility. The use of post-consumer scrap can significantly increase particulate emissions above what would be emitted from a true die cast facility, which uses only pure ingot or billet or in-house scrap.

US EPA Region V has provided IDEM, OAM with a guidance memo to determine when a source should be classified as a secondary metal production facility. A copy of this memo has been provided to Fort Wayne Foundry. The memo supports OAM's position that Fort Wayne Foundry is a secondary metal production facility.

Comment #2

Regarding **A.2(2)(a) and (b), D.2(a) and (b), and the TSD, facility descriptions**, Disa furnaces #1 and #2, these two furnaces are channeled together and share a common molten aluminum bath. All charging is performed at one furnace, while the other furnace is used exclusively for pouring. This is for economic and operational reasons. It is easier to maintain a constant bath temperature for pouring when metal is never directly charged to the pouring furnace. Because these two furnaces are essentially a single system, the capacity should be represented as the sum of the two, or 4.25 tons per hour of aluminum ingots and scrap. We request that the facility description and capacity for the two Disa furnaces be revised to reflect a combined, channeled furnace system. We recommend that the description for this system (both furnaces) be changed to, "One natural gas-fired reverberatory furnace system, identified as Disa Furnace System #1/#2, emission unit FD-1/2, constructed in 1986, with a maximum charge capacity of 4.25 tons per hour of aluminum ingots and scrap, and with a maximum production rate of 4.25 tons of melted aluminum per hour, with emissions uncontrolled, and exhausting through stacks D2 and D10".

Response #2

The description of the furnace system has been changed as suggested. The OAM agrees that the process weight rate of the furnace system should be 4.25 tons per hour. Therefore, the PM limit pursuant to 326 IAC 6-3-2 (process Operations) is calculated as follows:

$$4.1P^{0.67} = 10.81 \text{ pounds per hour}$$

This is less than the permitted limit of 0.50 pounds per ton of metal melted. Therefore, regarding the emission limits, no changes to the permit are necessary.

Comment #3

Regarding **D.3, D.4, and D.5, facility descriptions**, please replace the word "station" in the descriptions with "system".

Response #3

The requested change has been made in Sections D.3, D.4, and D.5 of the permit.

Comment #4

Regarding **A.2(3)(b) and D.3(2), facility descriptions**, Hunter #1 cooling system, please replace "exhausting to stack H30" with "exhausting to stack CD-1".

Response #4

The requested change has been made in Section A.2 and Section D.3 of the permit.

Comment #5

Regarding the **TSD (2), (3) and (4) facility descriptions**, Hunter and Disa lines, please change "shakeout systems" to "shakeout knockout systems".

Response #5

The final permit reflects the correct descriptions of these units. However, no changes are made to the TSD after the public comment period. The TSD remains the same in order to keep documentation of how the draft permit was produced. This addendum explains any necessary changes to the permit after the comment period. There is no need to make any changes to the TSD at this point.

Comment #6

Regarding **A.2(4)(b) and D.4(2), facility descriptions**, Hunter #2 cooling system, please replace “exhausting to stack H30” with “exhausting to stack CD-1”.

Response #6

The requested changes have been made.

Comment #7

Regarding **A.2(5)(b) and the TSD (4)(b), facility descriptions**, Disa cooling system, please replace “with emissions uncontrolled, and exhausting to stack RV” with “with emissions uncontrolled, and exhausting internally”.

Response #7

The requested changes have been made.

Comment #8

Regarding the **TSD (5), facility descriptions**, our Isocore core making process consists of 9 coremaking machines, CM-1 through CM-9. Machine CM-1 was installed in 1986, not 1988.

Response #8

The final permit reflects the correct descriptions of these units. However, no changes are made to the TSD after the public comment period. The TSD remains the same in order to keep documentation of how the draft permit was produced. This addendum explains any necessary changes to the permit after the comment period. There is no need to make any changes to the TSD at this point.

Comment #9

Regarding **A.3, D.9 and the TSD, Insignificant Activities**, we do not believe that it was intended that a Title V permit provide a specific list of equipment that qualify as insignificant activities. We believe that general categories such as shotblasting, finishing, grinding, and cutoff operations would suffice and produce a simpler permit. We request that general categories such as these replace the specific equipment listed in the permit.

Response #9

Insignificant activities listed in Section A.3 of the permit are only those that are specifically regulated by state or federal rules. 326 IAC 2-7-5 requires that all applicable requirements must be listed in the Title V operating permit. The TSD has a complete list of insignificant activities at the source. Those that were listed in the TSD and not in the permit, do not have specific rules that apply to them.

Comment #10

Regarding **B.10(a), Certification**, the condition as written is overly broad. We would recommend that the following phrase be added to the beginning of the condition. *“Where specifically designated by this permit or required by an applicable requirement, application forms, reports,”*

Response #10

The OAM agrees that the addition of this phrase will clarify the intent of the condition. The requested change has been made.

Comment #11

Regarding **B.28, Credible Evidence**, we request that the condition be eliminated from the permit because it is beyond the State's authority.

Response #11

IDEM now believes that this condition is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit.

~~B.27 — Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]
Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non-compliance.~~

Comment #12

Regarding **C.17, Compliance Monitoring Plan**, we do not believe that 40 CFR Part 70 or 326 IAC 2-7 provides any authority to require the preparation of a Compliance Response Plan (CRP) or to establish the basis for a violation of the permit for failure to conduct the identified response steps. Failure to take specific response steps should not be interpreted in any way as evidence of non-compliance with an underlying applicable requirement, which is implied by this permit condition. We request that all references to a CRP be eliminated from this condition.

Regarding **D.1.2, D.2.2, D.3.2, D.4.2, D.5.2, and D.7.2, Preventive Maintenance Plan**, a preventive maintenance plan (PMP) is required for emission control devices as specified at 326 IAC 1-6-3(a)(1). These facilities are uncontrolled and therefore do not have maintenance procedures that would be addressed by the Title V permitting program. We request that these sections be removed.

Response #12

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each Permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each Permittee's Annual Compliance Certification. Each Permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the Permittee's Preventive Maintenance Plan(PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the Permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to included a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were

part of the Preventive Maintenance Plan, with the purpose of maintaining the Permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a Permittee's maintenance staff handle the routine maintenance of the equipment, and a Permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comments sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a Permittee's PMP might call for the Permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the Permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the Permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the Permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most Permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The Permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the Permittee may know from experience, what replacement parts should be kept on hand. The Permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the Permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The Permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the

PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the Permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13) and for each FESOP permit pursuant to 326 IAC 2-8-4(9). Both of those rules refer back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most Permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the Permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A Permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the Permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading (Guidance, page 13). Some of the terminology has changed, as a result of comments from regulated sources, but the requirements in the permit do not conflict with the guidance. There are no changes in the conditions.

Comment #13

Regarding **C.22, General Reporting Requirements** Under this permit, we are required to submit an annual Compliance Certification, a quarterly Compliance Monitoring Report, and a semiannual Deviation Report. 326 IAC 2-7-5(3)(C) requires submittal of monitoring reports at least every six months. We believe that semiannual Compliance Monitoring Report submittal is the proper frequency until a more frequent submittal is specifically requested by the administrator. In addition, we believe that quarterly Compliance Monitoring Report submittal represents an unnecessary burden on our staff considering the excellent compliance history at this source. We request that Compliance Monitoring Reports and Deviation Reports be required on a semiannual basis.

Response #13

The purpose of the compliance monitoring report is so that the OAM can make sure that the source is

implementing all of the required compliance monitoring and that there are not excessive deviations from the normal operating conditions of the equipment, such as excessive "abnormal" visible emissions notations. The OAM believes that quarterly compliance monitoring reporting and deviation reports are a reasonable requirement. Also, if there is an emergency, the Emergency/Deviation Occurrence Report must be submitted within 2 days of the emergency; and if there is a deviation, the report must be submitted within 10 days. There have been no changes to the permit as a result of this comment.

Comment #14

Regarding **D.2.3, Testing Requirements**, we believe that emissions from our furnace systems are less than emissions from gray iron electric induction furnaces. The emission factors for gray iron electric induction furnaces are 0.90 lb PM/ton metal and 0.86 lb PM₁₀/ton metal. We therefore request that the testing requirements be removed for our Hunter furnace systems, considering that the emissions limitations are above the gray iron induction furnace emission factors.

Response #14

The Disa furnaces are relying on an emission factor smaller than the AIRS emission factor estimates in order to comply with the PSD minor limits in the permit. The Hunter furnaces are not relying on an emission factor smaller than the AIRS emission factor in order to comply with all of the permit requirements. Since only the Disa furnaces are relying on an alternate emission factor, the OAM agrees that only the Disa furnaces should be stack tested. The permit condition has been changed accordingly.

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 180 days after issuance of this permit, the Permittee shall perform PM testing on each of the Disa ~~and Hunter~~ furnaces using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.2.1. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Comment #15

Regarding **D.2.3, Testing Requirements**, we believe that the requirement to retest uncontrolled furnace emissions in 5 years should be determined when the Title V permit is renewed. In addition, this is not a performance test on control equipment, but a test to verify a process specific emission factor. It is extremely unlikely that emissions on an uncontrolled pounds per ton basis will vary significantly after five years of operation. It is more likely that ongoing process refinement will result in a decrease of uncontrolled emissions on a pounds per ton basis. We request that the requirement to retest uncontrolled furnace emissions in 5 years be deleted from the permit.

Response #15

The OAM agrees that the testing may not need to be performed again in five years. The OAM will review the test results and determine at the time of permit renewal whether another stack test is necessary on one or more of the furnaces. The statement that the tests shall be repeated at least once every five years has been removed from Condition D.2.3.

Comment #16

Regarding **D.2.4(a), D.3.5(a), D.4.5(a), D.5.4(a) and D.6.5(a), Visible Emissions Notations**, we believe that for a fairly clean operation such as ours, daily VE notations are excessive. On a day to day basis, our production and associated emissions are relatively consistent and do not suffer from radical changes. After many years of observing the workings and emissions from this foundry operation, we do not believe that daily VE notations would provide any information beyond that which weekly VE notations would provide. Also, our aggressive maintenance standards have resulted in very reliable particulate control equipment operation.

Although some exhaust points are visible to employees that must occasionally move about the facility grounds to complete their responsibilities, the locations of these exhausts do not allow observations from only one or two positions. Therefore, VE notations would have to be taken from multiple locations, representing a considerable time contribution from the individual with this responsibility. Given the current business environment, we maintain as small a work force as possible and do not have many personnel who could be given this responsibility. A weekly observation cycle would represent an acceptable interval, both from a compliance and personnel standpoint. We request that our monitoring frequency be adjusted to require weekly visible emissions notations.

In addition, many of our stacks can only be seen from the roof of our building. We are concerned that our staff may be required to access the roof during periods of poor weather when personal safety is an issue. We wish to request that the following statement be added to the visible emissions notations conditions: "During periods of inclement weather, visible emissions notations will be performed weather permitting." We have learned from conversation with management and environmental staff in other industries that this statement is commonly accepted by IDEM.

Response #16

Compliance monitoring conditions are in the permit in order to ensure continuous compliance with the requirements. The suggested wording would allow sporadic use of compliance monitoring, which would not accomplish the purpose of compliance monitoring. Baghouse failure can occur suddenly; therefore monitoring of baghouse operational parameters should be more frequently than weekly. The OAM believes that daily visible emissions notations are a reasonable requirement.

During times of inclement weather, it is permissible to take visible emissions notations from the ground, where even if the stack itself is not visible, excess opacity from a baghouse would be visible. This is not the preferred method during times of normal weather conditions; however to assure safety of the employees, the OAM will accept this method in place of viewing the actual stack, during times of inclement weather. During times of inclement weather when viewing of the actual stack is not practical, the records of the visible emissions notations should include a statement that visible emissions were observed from the ground where the stack itself was not clearly visible and should also include a description of the type of inclement weather which prevented viewing the stack from the rooftops.

Comment #17

Regarding **D.2.5, Record Keeping Requirements**, reverberatory furnaces are not charged discrete amounts of material following a specified charge frequency. A charge-melt-empty methodology is employed for induction and crucible furnaces. Because of the reverberatory operational design, we cannot charge single, large, easily weighed amounts of each separate charge material as would be required to track the weight percent of post consumer scrap each time a furnace is charged. A reverberatory furnace is intermittently charged the various charge materials throughout the day. For each shift of operation, the furnace foreman is issued a charge specification sheet that details the charge materials that will be required to be fed over the eight hour shift. This foreman is responsible for charging an even distribution of these materials throughout the shift. This ensures that the metal will have the consistent and proper chemical composition that is required for quality castings. Because of this, we request that the permit base the weight percent of post consumer scrap in the total charge on a half-shift, or four hour basis.

Response #17

The OAM agrees that the suggested method of documenting post-consumer scrap usage is more practical and feasible in this particular operation. The requirement has been changed to require recordkeeping of the amount of post-consumer scrap charged to the furnace every four hour period. Part (a) of the condition has been revised as follows:

D.2.5 Record Keeping Requirements

-
- (a) To document compliance with Condition D.2.1(c), the Permittee shall maintain records of

the amount of post consumer scrap charged to each of the furnaces ~~each time that each of the furnaces is charged~~ **every four hours** (as a weight percent of the total charge to each furnace **during that four hour time period**).

Comment #18

Regarding **D.3.1(b) and D.4.1(b), PSD**, the condition is not clear on whether the emission limit applies to controlled or uncontrolled emissions. The "0.07 lb PM/ton of metal cooled" emission rate is back calculated from 1.0 lb PM/ton of metal, a specified control efficiency, and a 2.25 tons/hr process rate. We request that in the interest of simplifying and clarifying the conditions, the requirement be changed to a limit of "1.0 lb/ton of metal cooled, before controls".

Response #18

The limits apply to emissions after controls. In order to clarify this, the conditions have been reworded to state that PM emissions shall not exceed 0.07 pound per ton of metal cooled after controls.

Comment #19

Regarding **D.3.6, D.4.6, and D.6.6, Parametric Monitoring**, we have experienced very reliable baghouse operation which we attribute to good maintenance practices. We believe that a weekly recording frequency would be acceptable for baghouse pressure drop readings and request that this frequency be indicated in the permit.

Response #19

Monitoring of the static pressure drop can alert the operator to relative changes (such as dust cake resistance) over a period of time. The operator can use this information to chart trends and determine if the unit is operating within the optimal range as determined by baseline testing of the unit and manufacturer's specifications. Pressure drop is an indicator of a variety of conditions within the baghouse. Any deviations from the normal operational range of the unit, whether gradual or sudden, should alert the operator that the unit needs maintenance. The Compliance Response Plan should include Response steps to anticipate corrective actions when abnormal conditions arise. Both gradual and sudden changes in the pressure drop could result in damage to the bags or baghouse if not properly addressed. Therefore, the OAM believes that pressure drop readings should be taken at least once per day. The requirements to measure the pressure drops across the baghouses will remain unchanged in the permit.

Comment #20

Regarding **D.3.6, D.4.6 and D.6.6, Parametric Monitoring**, we have not seen evidence that semiannual pressure gauge calibration is necessary and believe that annual calibration would be more than adequate. We have provided a letter from Dwyer, our gauge supplier, stating that an annual calibration frequency is recommended. Please note that Dwyer recommends a semiannual calibration frequency for critical applications, such as nuclear power plants. We request that our permit indicate an annual calibration frequency.

Response #20

Since the Permittee has provided documentation from the pressure gauge supplier indicating that calibration is only necessary once per year for this type of gauge in this particular operation, the OAM agrees to change the requirement in the permit from once every six months to once per year.

Comment #21

Regarding **D.3.7, D.4.7 and D.6.7, Baghouse Inspections**, as previously stated, we have experienced very reliable baghouse operation that we attribute to good maintenance practices, and do not believe

that quarterly baghouse inspections would provide any benefit beyond that which annual inspections would provide. In addition, the baghouse referenced in these sections does not handle abrasive particulate such as would be present in a gray iron grinding and cleaning process. Because of this, the bags experience far less wear and deterioration. We request that the inspection frequency be revised to reflect an annual schedule.

Response #21

The OAM encourages good maintenance practices. However, good maintenance practices cannot completely replace compliance monitoring. This particular baghouse controls emissions from two cooling lines, two shakeout systems, and a sand handling system. This baghouse receives a very high particulate loading, some of which consists of sand particles, which are abrasive. The OAM believes that quarterly baghouse inspections are appropriate for this baghouse. There have been no changes to this condition as a result of this comment.

Comment #22

Regarding **D.3.8(a), D.4.8(a), and D.6.8(a), Broken Bag or Failure Detection**, conditions requiring shutdown of control equipment during malfunction conditions are specifically covered by section B.13, Emergency Provisions. Considering that the Emergency Provisions are applicable source wide for any type of control equipment, and have been included as a B section, we request these D section conditions be removed from the permit.

Response #22

These conditions have been modified to clarify that if the baghouse failure qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions, then operations can continue. Modified Condition D.3.8 is shown below. Conditions D.4.8 and D.6.8 have also been modified as shown below.

D.3.8 Broken or Failed Bag or Failure Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~ Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~ For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Comment #23

Regarding **D.3.9 (b)(1)(B), D.4.9 (b)(1)(B), and D.6.9 (b)(1)(B), Record Keeping Requirements**, baghouse CD-1 does not have distinct cleaning cycles that can be noted. Also, because there are not distinct cycles, there is not a period during which a differential pressure can be recorded. The pulse cleaning is a continually occurring process that rotates through the different areas of the baghouse. We request that these requirements be removed.

Response #23

The purpose of the condition is to ensure that the cleaning cycle on the baghouse is operating properly. Since this baghouse is designed so that the cleaning cycle is continuous, the OAM agrees that it is not necessary to document the frequency of the cleaning cycle. The pressure drop readings will be sufficient to determine if the cleaning cycle is operating. Therefore these requirements have been deleted from the permit.

Comment #24

Regarding **D.4.9(b), D.5.9(b), and D.6.9(b), Record Keeping Requirements**, conditions (3), (4), (5), and (7), we are not certain what is specifically required. We believe that it is likely that these are items that are already contained in our preventive maintenance plans. Condition B.12 requires that Preventive Maintenance Plans be developed. We believe that these D section requirements are duplicative of the requirements of section B.12, and request these recordkeeping requirements be removed.

Response #24

Condition D.4.9 (b)(2) requires documentation of all response steps implemented, per event. This would include anything that was done in response to an out of range reading, such as an out of range pressure drop reading or observation of abnormal visible emissions.

Condition D.4.9(b)(3) requires that Operation and Compliance Response logs, including work purchase orders shall be maintained. This includes proof that such a response was actually taken, such as a purchase order for a new baghouse part to replace a broken one observed during a baghouse inspection in response to observing abnormal visible emissions.

Condition D.4.9(b)(4) requires maintaining Quality Assurance/quality Control (QA/QC) procedures. This is in reference to pressure gauges or other equipment used in complying with compliance monitoring requirements. For example, the Permittee should maintain a record of the procedures used to calibrate the pressure gauges used to read the differential static pressure across the baghouses.

Condition D.4.9(b)(7) requires maintaining an equipment "troubleshooting" contingency plan. This is documentation of the Compliance Response Plan, which states what the Permittee will do in cases where compliance monitoring indicates a potential problem or abnormal situation. For example, this plan would state what action should be taken if the pressure drop reading is above the indicated range.

Condition B.12 requires the Permittee to prepare and maintain a Preventive Maintenance Plan (PMP). It does not specifically state what the PMP should include for specific control devices. The OAM agrees that it is likely that some of the requirements of Condition D.4.10(b) will be contained in the PMP; however the OAM does not review the PMP for each source. The requirements of condition D.4.10(b) help to ensure that even if the PMP is inadequate, necessary maintenance will be performed on the baghouse and documented accordingly. No changes have been made to Condition D.4.10(b)(2), (3), (4), or (7).

Comment #25

Regarding **D.3.9(b)(8), D.4.9(b)(8), and D.6.9(b)(8), Record Keeping Requirements**, we do not have vents that we could redirect and request that these recordkeeping requirements be removed.

Response #25

The OAM has removed the requirements to keep records of the dates that vents are redirected.

Comment #26

Regarding **D.6.3, Testing Requirements**, the PM and PM₁₀ control efficiencies that we provided and were used in the permit are based on a conservative 0.01 grain/dscf loading and the design baghouse airflow for the sand system. We believe therefore that the controlled emission limit in the permit is conservative and that testing for verification of compliance is unnecessary. We request that the testing requirements be removed.

Response #26

Potential particulate emissions from the sand handling system are over 1400 tons per year. Particulate emissions from the sand handling system are required to meet a very stringent limit of 2.59 pounds per hour. This limit is required in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable. In order to meet this requirement, calculations show that the baghouse needs to meet an overall control efficiency of at least 99.2 percent. Because the limits on this facility are very stringent and are necessary in order to render the requirements of PSD not applicable, and because the potential emissions from the facility are so high, the OAM believes that a stack test is appropriate.

Comment #27

Regarding **D.7.5, Reporting Requirements**, the binder usage limits are greatly in excess of our current levels of usage. Considering that our inspector will review our in-house usage records on a fairly regular basis, and that our actual usage rate is low, we request that the reporting requirements be deleted.

Response #27

The binder usage limits are less than the design capacity of the facilities. Therefore, in order to demonstrate compliance, reporting of the usages is required. No changes have been made to the reporting requirements.

Upon further review, the OAM has decided to make the following changes to the permit (additions are shown in bold, deletions are shown as strikeouts).

Title Page

1. The rule cite for ENSR has been removed from the second paragraph of the title page. This rule has been repealed.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 ~~and 326 IAC 2-1-3.2~~ as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Section A

1. The description of the source in Section A.1 of the permit now specifies that the source is a secondary metal production facility, which is one of the 28 listed source categories, pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).
2. A.1 (General Information) the IDEM, OAM is now including the phone number in the general information. This will help in case OAM needs to contact the source regarding

their reporting requirements.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary ~~aluminum foundry~~ **secondary aluminum metal production facility, which is one of the 28 listed source categories, pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**.

Responsible Official: Mr. Curt French, Vice President - Foundry Operations
Source Address: 2509 East Pontiac Street, Fort Wayne, Indiana 46803
Mailing Address: 2509 East Pontiac Street, Fort Wayne, Indiana 46803
Phone Number: Kathy McCrudden - (219) 483-0382
SIC Code: 3365
County Location: Allen
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

3. A.3 (Specifically Regulated Insignificant Activities) now lists the rule cite that is making the insignificant activity "specifically regulated." This will clarify why certain insignificant activities are included in the permit.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including one (1) parts washer, constructed in 1991; [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) Shotblasting operations including the following:
 - (1) one (1) Spinablast III shotblast machine, constructed in 1995, with a maximum capacity of 2 tons of aluminum castings per hour, controlled by a baghouse, designated as CD3; [326 IAC 6-3-2]
 - (2) one (1) Wheelabrator blast machine, referred to as Wheelabrator I, constructed in 1987, with a maximum capacity of 1 ton of aluminum castings per hour, controlled by a baghouse, designated as CD4; [326 IAC 6-3-2] and
 - (3) the pattern woodworking shop controlled by a baghouse. [326 IAC 6-3-2]
- (c) the finishing, grinding, and cutoff operations constructed in 1976 including the following:
 - (1) one (1) Hunter dual 3" belt grinder, referred to as HGF1, controlled by baghouse CD7; [326 IAC 6-3-2]
 - (2) one (1) Hunter dual 3" belt grinder, referred to as HGF2, controlled by baghouse CD6; [326 IAC 6-3-2]
 - (3) one (1) Hunter dual 24" belt grinder, referred to as HGF3, controlled by baghouse CD5; [326 IAC 6-3-2]
 - (4) one (1) Hunter chopsaw; [326 IAC 6-3-2]
 - (5) one (1) Hunter hydraulic punch; [326 IAC 6-3-2]

- (6) two (2) Hunter hydraulic presses;[326 IAC 6-3-2]
- (7) three (3) Hunter process belts;[326 IAC 6-3-2]
- (8) three (3) leak testers;[326 IAC 6-3-2]
- (9) one Disa oscillating circular conveyor;[326 IAC 6-3-2]
- (10) three (3) Disa bandsaws;[326 IAC 6-3-2]
- (11) two (2) Disa dual 3" belt grinders;[326 IAC 6-3-2]
- (12) one (1) Disa 24" belt grinder, referred to as DGF2;[326 IAC 6-3-2]
- (13) two (2) Disa hydraulic presses; [326 IAC 6-3-2] and
- (14) one (1) Disa process belt.[326 IAC 6-3-2]
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.[326 IAC 6-3-2]

Section B

1. B.1 (Permit No Defense) 326 IAC 2-1 has been repealed.

B.1 Permit No Defense ~~[326 IAC 2-1-10]~~ [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with ~~326 IAC 2-1-3.2~~ or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

2. B.9 (Compliance with Permit Conditions) the following language has been added to show that conditions that are not federally enforceable may not constitute a violation of the Clean Air Act.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, **except those specifically designated as not federally enforceable**, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. B.10 (Certification) has been revised since there are currently no certifications that would not be required to be certified by the Responsible Official.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, **any** application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, ~~and any other certification required under this permit~~, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).
4. The OAM has decided that although we have the authority, it may be cumbersome for the source to list all insignificant activities in the annual compliance certification, so the requirement is being deleted from B.11(Annual Compliance Certification) of the permit.

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was based on continuous or intermittent data;
- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); **and**
- ~~(5) Any insignificant activity that has been added without a permit revision; and~~
- ~~(6)~~**(5)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

5. B.12 (Preventive Maintenance Plan) paragraph (b) and (c) have been revised.

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that ~~lack of proper maintenance~~ **failure to implement the Preventive Maintenance Plan** does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. **IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.**

6. B.13 (Emergency Provisions) the rule cite in paragraph (e) has been revised to reflect the new Article 2 rule.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC ~~2-7-4(e)(9)~~ **2-7-4(c)(10)** be revised in response to an emergency.

7. B.14 (Permit Shield) paragraph (d) has been revised to clarify the intent of the condition. The rule cite in paragraph (h) has been revised to reflect the new Article 2 rule.

B.14 Permit Shield [326 IAC 2-7-15]

- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. **Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.**

- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC ~~2-7-12(b)(8)~~ **2-7-12(b)(7)**]

8. B.16 (Deviations from Permit Requirements and Conditions) paragraph (b)(3) has been revised to be consistent with B.12.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless ~~lack of maintenance~~ **such failure** has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

9. B.18(b)(1)(B) (Permit Renewal) 326 IAC 2-5 has been repealed.

B.18 Permit Renewal [326 IAC 2-7-4]

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. ~~[326 IAC 2-5-3]~~

10. B.21 (Changes Under Section 502(b)(10) of the Clean Air Act) has been deleted and B.22(b) (Operational Flexibility) has been revised as follows. Both conditions refer to the same rule and it makes more sense for them to be combined. In Condition B.22 (re-numbered B.21)(Operational Flexibility) 326 IAC 2-1 has been replaced with 326 IAC 2-1.1 in B.22(a)(2).

B.21 ~~Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]~~

~~The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:~~

- ~~_____ (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.~~
- ~~_____ (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).~~

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC ~~2-4~~ **2-1.1** has been obtained;

~~(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:~~

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).**
- (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:**
 - ~~(1)(i)~~ A brief description of the change within the source;
 - ~~(2)(ii)~~ The date on which the change will occur;
 - ~~(3)(iii)~~ Any change in emissions; and
 - ~~(4)(iv)~~ Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

11. B.23 (re-numbered B.22)(Construction Permit Requirement) the referenced statute has been repealed; therefore this condition has been revised.

B.22 Construction Permit Requirement [326 IAC 2]

~~Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, A~~ modification, construction, or reconstruction shall be approved ~~as if~~ required by and in accordance with **the applicable provisions of 326 IAC 2.**

12. In order to clarify confidentiality B.24 (re-numbered as B.23)(Inspection and Entry) has been

revised. OAM also determined that subpart (1) and (2) of paragraph (e) were unnecessary; therefore they have been deleted.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, **and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such**, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
- [326 IAC 2-7-6(6)]

~~_____ (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]~~

~~_____ (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]~~

13. B.25 (re-numbered B.24) (Transfer of Ownership or Operation) 326 IAC 2-1 has been repealed therefore this condition has been modified.

~~**B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]**~~

~~_____ Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:~~

~~_____ (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.~~

~~_____ (b) The written notification shall be sufficient to transfer the permit to the new owner by an~~

~~administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~_____ (c) _____ IDEM, OAM, shall reserve the right to issue a new permit.~~

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) **The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.**

(b) **Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:**

**Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) **The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

14. B.26 (re-numbered as B.25)(Annual Fee Payment) (b) has been revised.

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(b) **Failure Except as provided in 326 IAC 2-7-19(e), failure** to pay may result in administrative enforcement action or revocation of this permit.

15. B.27 (re-numbered as B.26)(Enhanced New Source Review) has been replaced with a new condition because ENSR has been repealed.

~~**B.27 Enhanced New Source Review [326 IAC 2]**~~

~~The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.~~

B.26 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 if such modifications occur during the term of this permit.

Section C

1. C.2 (Opacity) has been revised as follows to reflect the current rule language.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity Limitations**), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions opacity~~ shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~, **any one (1) six (6) minute averaging period** as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor** in a six (6) hour period.

2. C.4(Incineration) has been revised to say that 326 IAC 9-1-2 is not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. **The provisions of 326 IAC 9-1-2 are not federally enforceable.**

3. C.6 (Operation of Equipment) has been revised since there may be control devices that are not required to be used to assure compliance with emission limitations.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

4. C.8(Asbestos Abatement Projects) paragraph (e) has been revised to more accurately reflect the rule.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the **applicable** emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are ~~mandatory~~ **applicable** for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

5. C.9 (Performance Testing) has been revised to specify the locations of applicable procedures and analysis methods for performance testing.

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing ~~methods~~ **any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures** approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management

Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the ~~Commissioner~~ **IDEM, OAM**, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

6. C.11 (Compliance Monitoring) has been revised to clarify when compliance monitoring must begin.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. **All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.** The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment ~~no more than ninety (90) days after receipt of this permit.~~ If due to circumstances beyond its control, ~~this schedule cannot be met that~~ **equipment cannot be installed and operated within ninety (90) days**, the Permittee may extend the compliance schedule **related to the equipment for** an additional ninety (90) days provided the Permittee notifies:

7. C.13 (Monitoring Methods) has been revised to clarify that the monitoring and testing requirements are located in Section D of the permit.

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing ~~required by Section D performed to meet the applicable requirements~~ of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

8. The first paragraph of C.16 (Risk Management Plans) has been revised to more closely match the rule language.

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present ~~in a process at a source~~ in more than ~~the a~~ threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:

- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (3) Verify to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- 9. C.21 (General Record Keeping Requirements) (c)(4) has been modified to match B.12.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that ~~improper maintenance~~ **failure to implement the Preventive Maintenance Plan** did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- 10. C.22 (General Reporting Requirements) has been changed as follows to clarify exactly which documents require certification by the responsible official.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. **The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within

thirty (30) days of the end of the reporting period. **The reports do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. **The Emergency/Deviation Occurrence Report does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

~~The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).~~

Section D

1. The facility description boxes in each D Section of the permit have been revised to clarify that descriptive information is not federally enforceable. The facility description box for Section D.1 is shown as an example.

Facility Description [326 IAC 2-7-5(15)] the scrap and charge handling process, constructed in 1976, with a maximum charge rate of 9.75 tons of aluminum ingots and scrap per hour, with emissions uncontrolled.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

2. D.1.3, D.7.3, and D.9.2 (Testing Requirements) have been modified to delete the phrase “at any specific time.” Revised condition D.1.3 is shown as an example.

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing ~~at any specific time~~ when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

3. D.2.4, D.2.5, D.3.5, D.3.9, D.4.5, D.4.9, D.5.4, D.5.5, D.6.5, and D.6.9 have been revised to require visible emissions notations once per shift instead of once per day. D.2.4 and D.2.5 are shown examples

D.2.4 Visible Emissions Notations

- (a) ~~Daily~~ Visible emission notations of each of the furnace stack exhausts shall be performed **once per shift** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

D.2.5 Record Keeping Requirements

- (b) To document compliance with Condition D.2.4, the Permittee shall maintain records of ~~daily~~ visible emission notations of the furnace stack exhausts **once per shift**.

4. D.3.4, D.4.4, D.6.4, and D.9.3 (Particulate Matter) have been revised to clarify for which facilities the controls are required. Condition D.6.4 is shown as an example.

D.6.4 Particulate Matter (PM)

The baghouse for PM control shall be in operation **and control emissions from the sand handling system** at all times when the sand handling system are in operation.

5. D.8.1 (Volatile Organic Compounds) “matter” should be “manner”.

D.8.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a ~~matter~~ **manner** that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

6. In Condition D.8.2(a)(2) and (5) (Volatile Organic Compounds) the extra parenthesis after

"mercury" has been removed.

D.8.2 Volatile Organic Compounds (VOC)

- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
7. In Sections D.3, D.4, and D.6 of the permit, the descriptions now include a list of all facilities controlled by the baghouse CD-1. This change has been made for clarification purposes.

Reporting Forms

1. On the Emergency/Deviation Occurrence Report Form, the rule cite 326 IAC 2-7-5(3)(c) should have been a capital C, 326 IAC 2-7-5(3)(C).

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c) 326 IAC 2-7-5(3)(C)
C	The Permittee must submit notice in writing within ten (10) calendar days

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name: Fort Wayne Foundry Corp. - Pontiac Street Division
Source Location: 2509 East Pontiac Street, Fort Wayne, Indiana 46803
County: Allen
SIC Code: 3365
Operation Permit No.: T003-6027-00070
Permit Reviewer: Nisha Sizemore

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Fort Wayne Foundry Corp. - Pontiac Street Division relating to the operation of an aluminum foundry.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) the scrap and charge handling process, constructed in 1976, with a maximum charge rate of 9.75 tons of aluminum ingots and scrap per hour, with emissions uncontrolled;
- (2) one (1) sand handling system, consisting of the following:
 - (a) one sand muller, identified as SM-1, constructed in 1977, with a maximum capacity of 90 tons of sand per hour, controlled by baghouse CD1, and exhausting through stack CD1;
 - (b) sand conveying and screening, identified as SS-1, constructed in 1977, with a maximum capacity of 90 tons of sand per hour, controlled by baghouse CD1, and exhausting through stacks RV and CD1;
- (3) one (1) Isocure core machine, identified as CM-9, constructed in 1998, with a maximum capacity of 0.75 ton of sand per hour, with emissions uncontrolled and exhausting through stack C6.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

The source also consists of the following unpermitted facilities/units:

- (1) the aluminum melting process, consisting of the following:
 - (a) one (1) natural gas-fired reverberatory furnace system, identified as Disa #1, emission unit FD-1, constructed in 1986, with a maximum charge rate of 2.5

- tons per hour of aluminum ingots and scrap, and with a maximum production rate of 2.5 tons of melted aluminum per hour, with emissions uncontrolled, and exhausting through stacks D2 and D10;
- (b) one (1) natural gas-fired reverberatory furnace system, identified as Disa #2, emission unit FD-2, constructed in 1986, with a maximum charge rate of 1.75 tons per hour of aluminum ingots and scrap, and with a maximum production rate of 1.75 tons of melted aluminum per hour, with emissions uncontrolled, and exhausting through stack D2;
 - (c) one (1) natural gas-fired reverberatory furnace system, identified as Hunter #1, emission unit FH-1, constructed in 1990, with a maximum charge rate of 1.75 tons per hour of aluminum ingots and scrap, and with a maximum production rate of 1.75 tons of melted aluminum per hour, with emissions uncontrolled, and exhausting through stacks H8, H11, and H22;
 - (d) one (1) natural gas-fired reverberatory furnace system, identified Hunter #2, emission unit FH-2, constructed in 1992, with a maximum charge rate of 1.5 tons per hour of aluminum ingots and scrap, and with a maximum production rate of 1.5 tons of melted aluminum per hour, with emissions uncontrolled, and exhausting through stacks H8, H11, and H22;
 - (e) one (1) natural gas-fired reverberatory furnace system, identified Hunter #3, emission unit FH-3, constructed in 1995, with a maximum charge rate of 2.25 tons per hour of aluminum ingots and scrap, and with a maximum production rate of 2.25 tons of melted aluminum per hour, with emissions uncontrolled, and exhausting through stacks H8, H11, and H22.
- (2) the Hunter #1 pouring, cooling, and shakeout processes, consisting of the following:
- (a) one (1) pouring system, identified as Hunter #1, emission unit H-1, constructed in 1981, with a maximum capacity of 2.25 tons of melted aluminum per hour and a maximum capacity of 33.75 tons of sand per hour, with emissions uncontrolled, and exhausting to stack H30;
 - (b) one (1) cooling system, identified as Hunter #1, emission unit H-1, constructed in 1981, with a maximum capacity of 2.25 tons of melted aluminum per hour and a maximum capacity of 33.75 tons of sand per hour, with emissions controlled by baghouse CD-1, and exhausting to stack CD-1;
 - (c) one (1) castings shakeout system, identified as Hunter #1, emission unit H-1, constructed in 1981, with a maximum capacity of 2.25 tons of melted aluminum per hour and a maximum capacity of 33.75 tons of sand per hour, with emissions controlled by baghouse CD-1, and exhausting to stack CD-1;
- (3) the Hunter #2 pouring, cooling, and shakeout processes, consisting of the following:
- (a) one (1) pouring system, identified as Hunter #2, emission unit H-2, constructed in 1977, with a maximum capacity of 2.25 tons of melted aluminum per hour and a maximum capacity of 33.75 tons of sand per hour, with emissions uncontrolled, and exhausting to stack H30;
 - (b) one (1) cooling system, identified as Hunter #2, emission unit H-2, constructed in 1977, with a maximum capacity of 2.25 tons of melted aluminum per hour and a maximum capacity of 33.75 tons of sand per hour, with emissions controlled

- by baghouse CD-1, and exhausting to stack CD-1;
- (c) one (1) castings shakeout system, identified as Hunter #2, emission unit H-2, constructed in 1977, with a maximum capacity of 2.25 tons of melted aluminum per hour and a maximum capacity of 33.75 tons of sand per hour, with emissions controlled by baghouse CD-1, and exhausting to stack CD-1;
- (4) the Disa pouring, cooling, and shakeout processes, consisting of the following:
- (a) one (1) pouring system, identified as Disa #1, emission unit D-1, constructed in 1986, with a maximum capacity of 4.25 tons of melted aluminum per hour and a maximum capacity of 63.75 tons of sand per hour, with emissions uncontrolled, and exhausting to stack RV;
 - (b) one (1) cooling system, identified as Disa #1, emission unit D-1, constructed in 1986, with a maximum capacity of 4.25 tons of melted aluminum per hour and a maximum capacity of 63.75 tons of sand per hour, with emissions uncontrolled, and exhausting to stack RV;
 - (c) one (1) castings shakeout system, identified as Disa #1, emission unit D-1, constructed in 1986, with a maximum capacity of 4.25 tons of melted aluminum per hour and a maximum capacity of 63.75 tons of sand per hour, with emissions uncontrolled, and exhausting to stack RV;
- (5) eight (8) core making machines, identified as CM-1 through CM-8, constructed in 1988, 1986, 1987, 1990, 1991, 1994, 1994, and 1995, respectively, each with a maximum capacity of 0.75 ton of sand per hour, all uncontrolled and exhausting through stacks C5 and C6.

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour;
- (2) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (3) Storage tanks with capacity less than or equal to 1000 gallons and annual throughputs less than 12,000 gallons;
- (4) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (5) Refractory storage not requiring air pollution control equipment;
- (6) Filling of drums, pails, or other packaging containers with lubricating oils, waxes, and greases;

- (7) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (8) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including one parts washer constructed in 1991;
- (9) Cleaners and solvents characterized as follows:
 - (a) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - (b) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (10) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment;
- (11) Closed loop heating and cooling systems;
- (12) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
- (13) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (14) Heat exchanger cleaning and repair;
- (15) Process vessel degassing and cleaning to prepare for internal repairs;
- (16) Paved and unpaved roads and parking lots with public access;
- (17) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (18) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (19) On-site fire and emergency response training approved by the department;
- (20) Gasoline generators not exceeding 110 horsepower;
- (21) Diesel generators not exceeding 1600 horsepower;
- (22) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. Processes in this category which are located at the source include the following:
 - (a) one (1) Spinablast III shotblast machine, constructed in 1995, with a maximum capacity of 2 tons of aluminum castings per hour, controlled by a baghouse, designated as CD3;

- (b) one (1) Wheelabrator blast machine, referred to as Wheelabrator I, constructed in 1987, with a maximum capacity of 1 ton of aluminum castings per hour, controlled by a baghouse, designated as CD4; and
 - (c) the pattern woodworking shop controlled by a baghouse.
- (23) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kiloPascals measured at 38 degrees (C);
- (24) the finishing, grinding, and cutoff operations constructed in 1976 including the following:
 - (a) one (1) Hunter dual 3" belt grinder, referred to as HGF1, controlled by baghouse CD7;
 - (b) one (1) Hunter dual 3" belt grinder, referred to as HGF2, controlled by baghouse CD6;
 - (c) one (1) Hunter dual 24" belt grinder, referred to as HGF3, controlled by baghouse CD5;
 - (d) one (1) Hunter chopsaw;
 - (e) one (1) Hunter hydraulic punch;
 - (f) two (2) Hunter hydraulic presses;
 - (g) three (3) Hunter process belts;
 - (h) three (3) leak testers;
 - (i) one Disa oscillating circular conveyor;
 - (j) three (3) Disa bandsaws;
 - (k) two (2) Disa dual 3" belt grinders;
 - (l) one (1) Disa 24" belt grinder, referred to as DGF2;
 - (m) two (2) Disa hydraulic presses; and
 - (n) one (1) Disa process belt.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) OP 02-01-93-0708, issued on October 25, 1989; and
- (2) CP 003-9517, issued on May 14, 1998.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on June 3, 1996. Additional information was received on April 8, 1998, July 9, 1998, and August 5, 1998.

A notice of completeness letter was mailed to the source on April 17, 1998.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	greater than 100
PM-10	greater than 100
SO ₂	less than 100
VOC	greater than 100
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Acrolein	less than 10
Benzene	less than 10
Formaldehyde	less than 10
Naphthalene	less than 10
Phenol	less than 10
Toluene	less than 10
Triethylamine	greater than 10
o-Xylene	less than 10
m-Xylene	less than 10
Lead Compounds	less than 10
Cyanide Compounds	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of PM-10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1997 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	56.81
PM-10	56.81
SO ₂	0.28
VOC	61.53
CO	2.04
NO _x	10.33

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Hunter #2 pouring, cooling, and shakeout	57.05	36.95	0.00	1.15	0.00	0.00	0.53
sand handling	41.95	6.29	0.00	0.00	0.00	0.00	0.00
Hunter #1 pouring, cooling, and shakeout	24.0	14.0	0.00	3.04	0.00	0.00	1.40
Isocure core machines #1, #2, and #3	0.00	0.00	0.00	38.04	0.00	0.00	19.2
Disa furnace #1	4.66	4.66	0.00	0.27	0.00	0.00	0.00
Disa furnace #2	4.66	4.66	0.00	0.18	0.00	0.00	0.00
Disa pouring, cooling, and shakeout	19.87	12.87	0.00	0.51	0.00	0.00	0.24
Hunter #1 furnace	3.83	3.83	0.00	1.53	0.00	0.00	0.00
Isocure core machines #4 and #5	0.00	0.00	0.00	37.47	0.00	0.00	19.2
Hunter #2 furnace	3.29	3.29	0.00	1.31	0.00	0.00	0.00
Hunter #3 furnace	4.93	4.93	0.00	1.97	0.00	0.00	0.00
Isocure core machines #6, #7, and #8	0.00	0.00	0.00	37.03	0.00	0.00	19.2
Isocure core machine #9	0.00	0.00	0.00	21.4	0.00	0.00	1.34
Total Emissions	164.24	81.48	2.00	143.90	0.00	0.00	61.11

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) applicable to this source.

The parts washing station is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T, because the solvent used does not contain any of the following halogenated solvents in concentrations greater than five percent by weight: methylene chloride, 1,1,1-trichloroethane, trichloroethylene, perchloroethylene, carbon tetrachloride, or chloroform.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This existing source is a major stationary source because it is one of the 28 listed source categories (secondary metal production) and at least one attainment regulated pollutant is emitted at a rate of 100 tons per year. This source has never been reviewed under the requirements of PSD.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM, PM₁₀, SO₂, and NO_x. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - The scrap and charge handling process

326 IAC 6-3-2 (Process Operations)

Pursuant to this rule, the PM emissions from the scrap and charge handling process shall not exceed 18.85 pounds per hour when operating at a process weight rate of 9.75 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Based on calculations made, the scrap and charge handling process is in compliance with this requirement.

**State Rule Applicability - Disa #1 Reverberatory Furnace, constructed in 1986;
Disa #2 Reverberatory Furnace, constructed in 1986;
Hunter #1 Reverberatory Furnace, constructed in 1990;
Hunter #2 Reverberatory Furnace, constructed in 1992; and
Hunter #3 Reverberatory Furnace, constructed in 1995**

326 IAC 6-3 (Process Operations)

Pursuant to this rule, the allowable PM emission rate from the furnaces shall be limited as follows:

- (a) The PM emissions from the Disa #1 furnace shall not exceed 7.6 pounds per hour when operating at a process weight rate of 2.5 tons per hour.
- (b) The PM emissions from the Disa #2 furnace shall not exceed 6.0 pounds per hour when operating at a process weight rate of 1.75 tons per hour.
- (c) The PM emissions from the Hunter #1 furnace shall not exceed 6.0 pounds per hour when operating at a process weight rate of 1.75 tons per hour.
- (d) The PM emissions from the Hunter #2 furnace shall not exceed 5.4 pounds per hour when operating at a process weight rate of 1.5 tons per hour.
- (e) The PM emissions from the Hunter #3 furnace shall not exceed 7.1 pounds per hour when operating at a process weight rate of 2.25 tons per hour.

The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and}$$

P = process weight rate in tons per hour

Based on calculations, the furnaces are in compliance with these limits.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

In order to render the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 not applicable, the following conditions shall apply:

- (a) The PM emissions from each of the Disa furnaces shall not exceed 0.50 pound per ton of metal melted. This limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations).
- (b) The PM emissions from the Hunter #1 furnace shall not exceed 3.13 pounds per ton of metal melted.
- (c) The PM10 emissions from the Hunter #1 furnace shall not exceed 1.83 pounds per ton of metal melted.
- (d) The PM emissions from the Hunter #2 furnace shall not exceed 3.65 pounds per ton of metal melted.
- (e) The PM10 emissions from the Hunter #2 furnace shall not exceed 2.13 pounds per ton of metal melted.
- (f) The PM emissions from the Hunter #3 furnace shall not exceed 2.44 pounds per ton of metal melted.
- (g) The PM10 emissions from the Hunter #3 furnace shall not exceed 1.42 pounds per ton of metal melted.

Therefore, the requirements of 326 IAC 2-2 and 40 CFR 52.21 shall not apply.

326 IAC 8-1-6 (Best Available Control Technology (BACT))

The furnaces have potential VOC emissions less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 (BACT) do not apply. No other 326 IAC 8 rules apply.

**State Rule Applicability - Hunter #1 Pouring / Casting Line;
Hunter #1 Cooling Line; and
Hunter #1 Castings Shakeout Station, all constructed in 1981;**

326 IAC 6-3-2 (Process Operations)

Pursuant to this rule, the PM emissions shall comply with the following:

- (a) The PM emissions from the Hunter #1 pouring line shall not exceed 41.6 pounds per hour when operating at a process weight rate of 36 tons per hour.
- (b) The PM emissions from the Hunter #1 cooling line shall not exceed 41.6 pounds per hour when operating at a process weight rate of 36 tons per hour.
- (c) The PM emissions from the Hunter #1 Castings Shakeout Station shall not exceed 41.6 pounds per hour when operating at a process weight rate of 36 tons per hour.

The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate greater than 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Based on calculations made, the pouring, cooling, and shakeout lines are in compliance with this requirement. The baghouse CD-1 shall be in operation at all times that the cooling or shakeout process is in operation in order to comply with these limits.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

In order to render the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 not applicable, the following conditions shall apply:

- (a) The PM emissions from the Hunter #1 pouring operation shall not exceed 0.5 pound per ton of metal poured.
- (b) The PM emissions from the Hunter #1 cooling operation shall not exceed 0.07 pound per ton of metal cooled.
- (c) The PM emissions from the Hunter #1 shakeout operation shall not exceed 2.66 pounds per hour.
- (d) The baghouse CD-1 shall be in operation at all times the Hunter #1 cooling or the Hunter #1 shakeout station is in operation, in order to render the requirements of this rule not applicable.

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

326 IAC 8-1-6 (Best Available Control Technology (BACT))

The Hunter #1 pouring, cooling, and shakeout operations have potential VOC emissions less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 (BACT) do not apply. No other 326 IAC 8 rules apply.

**State Rule Applicability - Hunter #2 Pouring / Casting Line;
Hunter #2 Cooling Station; and
Hunter #2 Castings Shakeout Station, all constructed in 1977**

326 IAC 6-3-2 (Process Operations)

Pursuant to this rule, the PM emissions shall comply with the following:

- (a) The PM emissions from the Hunter #2 pouring line shall not exceed 41.6 pounds per hour when operating at a process weight rate of 36 tons per hour.
- (b) The PM emissions from the Hunter #2 cooling line shall not exceed 41.6 pounds per hour when operating at a process weight rate of 36 tons per hour.
- (c) The PM emissions from the Hunter #2 Castings Shakeout Station shall not exceed 41.6 pounds per hour when operating at a process weight rate of 36 tons per hour.

The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate greater than 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Based on calculations made, the pouring, cooling and shakeout lines are in compliance with this requirement. The baghouse CD-1 shall be in operation at all times that the cooling or shakeout process is in operation in order to comply with these limits.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

In order to render the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 not applicable, the following conditions shall apply:

- (a) The PM emissions from the Hunter #2 pouring operation shall not exceed 0.5 pound per ton of metal poured.
- (b) The PM emissions from the Hunter #2 cooling operation shall not exceed 0.07 pound per ton of metal cooled.
- (c) The PM emissions from the Hunter #2 shakeout operation shall not exceed 2.66 pounds per hour.
- (d) The baghouse CD-1 shall be in operation at all times the Hunter #2 cooling or the Hunter #2 shakeout station is in operation, in order to render the requirements of this rule not applicable.

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

326 IAC 8-1-6 (Best Available Control Technology (BACT))

The Hunter #2 pouring, cooling, and shakeout operations were constructed prior to 1980. Therefore, the requirements of 326 IAC 8-1-6 (BACT) do not apply. No other 326 IAC 8 rules apply.

**State Rule Applicability - Disa Pouring / Casting Line;
Disa Castings Cooling Line; and
Disa Castings Shakeout Station, all constructed in 1986**

326 IAC 6-3-2 (Process Operations)

Pursuant to this rule, the PM emissions shall comply with the following:

- (a) The PM emissions from the Disa pouring line shall not exceed 47.5 pounds per hour when operating at a process weight rate of 68 tons per hour.
- (b) The PM emissions from the Disa cooling line shall not exceed 47.5 pounds per hour when operating at a process weight rate of 68 tons per hour.
- (c) The PM emissions from the Disa Castings Shakeout Station shall not exceed 47.5 pounds per hour when operating at a process weight rate of 68 tons per hour.

The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate greater than 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Based on calculations made, the pouring, cooling, and shakeout operations are in compliance with this requirement.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

In order to render the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 not applicable, the following conditions shall apply:

- (a) The PM emissions from the Disa pouring operation shall not exceed 0.5 pounds per ton of metal poured.
- (b) The PM emissions from the Disa cooling operation shall not exceed 1.0 pound per ton of metal cooled.
- (c) The PM emissions from the Disa shakeout operation shall not exceed 13.6 pounds per hour.

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

326 IAC 8-1-6 (Best Available Control Technology (BACT))

The Disa pouring, cooling, and shakeout operations have potential VOC emissions less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 (BACT) do not apply. No other 326 IAC 8 rules apply.

State Rule Applicability - The sand handling system (SH-1) controlled by baghouse CD-1

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

In order to render the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 not applicable, the following conditions shall apply:

- (a) The baghouse CD-1 shall be in operation at all times the sand handling system SH-1 is in operation, in order to render the requirements of this rule not applicable.
- (b) The PM emissions from the baghouse controlling the sand handling system shall not exceed 2.59 pounds per hour.

Therefore, the requirements of 326 IAC 2-2 (PSD) and 40 CFR 52.21 shall not apply.

326 IAC 6-3-2 (Process Operations)

Pursuant to this rule, the PM emissions from the sand handling system SH-1 shall not exceed 50.2 pounds per hour when operating at a process weight rate of 90.0 tons of sand per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight greater than 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Based on calculations made, the sand handling system SH-1 is in compliance with this requirement. The baghouse CD-1 shall operate at all times that the sand handling system is in operation in order to comply with this limit.

State Rule Applicability - Isocure Core Machines, ISO-1, ISO-2, and ISO-3, constructed in 1986

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The combined resin usage for Isocure core machines ISO-1, ISO-2, and ISO-3 shall be limited to 186.59 tons per 12 consecutive month period. This usage limit is required to limit the potential to emit VOC to no greater than 38.04 tons per 12 consecutive month period. The other 1.06 tons of VOC is from the Disa furnaces and from the Disa pouring, cooling, and shakeout processes. This makes a total of 39 tons of VOC for all of the emission units constructed in 1986. Compliance with this limit makes 326 IAC 2-2 (PSD) and 40 CFR 52.21 not applicable.

326 IAC 8-1-6 (BACT)

Each core making machine has potential emissions of VOC less than 25 tons per year; therefore, the requirements of 326 IAC 8-1-6 (BACT) will not apply. No other 326 IAC 8 rules apply.

State Rule Applicability - Isocure Core Machines, ISO-4, and ISO-5, constructed in 1990 and 1991

326 IAC 8-1-6 (BACT)

Each core making machine has potential emissions of VOC less than 25 tons per year; therefore, the requirements of 326 IAC 8-1-6 (BACT) will not apply. No other 326 IAC 8 rules apply.

State Rule Applicability - Isocure Core Machines, ISO-6, ISO-7, and ISO-8, constructed in 1994, 1994, and 1995, respectively

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The combined resin usage for Isocure core machines ISO-6, ISO-7, and ISO-8 shall be limited to 181.77 tons per 12 consecutive month period. This usage limit is required to limit the potential to emit VOC to no greater than 37.0 tons per 12 consecutive month period. The other 2.0 tons of VOC are from the Hunter #3 furnace. This makes a total of 39 tons of VOC for all of the emission units constructed in 1986. Compliance with this limit makes 326 IAC 2-2 (PSD) and 40 CFR 52.21 not applicable.

326 IAC 8-1-6 (BACT)

Each core making machine has potential emissions of VOC less than 25 tons per year; therefore, the requirements of 326 IAC 8-1-6 (BACT) will not apply. No other 326 IAC 8 rules apply.

State Rule Applicability - Isocure Core Machine, ISO-9, constructed in 1998

326 IAC 8-1-6 (BACT)

The core making machine has potential emissions of VOC less than 25 tons per year; therefore, the requirements of 326 IAC 8-1-6 (BACT) will not apply. No other 326 IAC 8 rules apply.

State Rule Applicability - insignificant degreasing operation, including 1 parts washer, constructed in 1991

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to this rule, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

- (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

State Rule Applicability - The Spinablast Shotblast Machine, constructed in 1995

326 IAC 6-3-2 (Process Operations)

Pursuant to this rule, the PM emissions from the Spinablast shotblast machine shall not exceed 6.52 pounds per hour when operating at a process weight rate of 2.0 tons of aluminum castings per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Based on calculations made, the Spinablast shotblast machine is in compliance with this requirement.

State Rule Applicability - The Wheelabrator Blast machine, constructed in 1987

326 IAC 6-3-2 (Process Operations)

Pursuant to this rule, the PM emissions from the Wheelabrator blast machine shall not exceed 4.1 pounds per hour when operating at a process weight rate of 1.0 ton of aluminum castings per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Based on calculations made, the Wheelabrator blast machine is in compliance with this requirement.

State Rule Applicability - The finishing, grinding, and cutoff operations, constructed in 1976

326 IAC 6-3-2 (Process Operations)

Pursuant to this rule, the PM emissions from the finishing, grinding, and cutoff operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

State Rule Applicability - The pattern shop woodworking process

326 IAC 6-3-2 (Process Operations)

Pursuant to this rule, the PM emissions from the pattern shop woodworking shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

State Rule Applicability - The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.

326 IAC 6-3-2 (Process Operations)

Pursuant to this rule, the PM emissions from the above listed activities shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are

found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

**Compliance Monitoring - Disa #1 Reverberatory Furnace, constructed in 1986;
Disa #2 Reverberatory Furnace, constructed in 1986;
Hunter #1 Reverberatory Furnace, constructed in 1990;
Hunter #2 Reverberatory Furnace, constructed in 1992; and
Hunter #3 Reverberatory Furnace, constructed in 1995**

The furnaces have applicable compliance monitoring conditions as specified below:

- (1) Within 180 days after issuance of this permit, the Permittee shall perform PM testing on all furnaces and PM10 testing on each of the Hunter furnaces using methods as approved by the Commissioner, in order to demonstrate compliance with the PSD limits specified in this permit. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.
- (2) Daily visible emissions notations of each of the furnace stack exhausts shall be performed during normal daylight operations when each of the furnaces are in operation. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (3) The Permittee shall maintain records of the daily visible emission notations of each of the furnace stack exhausts.

Compliance Monitoring - The Hunter #1 pouring, cooling, and shakeout processes

The Hunter #1 pouring, cooling, and shakeout processes have applicable compliance monitoring conditions as specified below:

- (1) Within 180 days after issuance of this permit, the Permittee shall perform PM testing on the Hunter #1 pouring, cooling, and shakeout processes using methods as approved by the Commissioner, in order to demonstrate compliance with the PSD limits specified in this permit. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM

may require compliance testing when necessary to determine if the facility is in compliance.

- (2) Daily visible emissions notations of the baghouse CD-1 stack exhaust shall be performed during normal daylight operations when the cooling and shakeout are in operation. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (3) The Permittee shall maintain records of the daily visible emission notations of the baghouse CD-1 stack exhaust.
- (4) The Permittee shall record the total static pressure drop across the baghouse CD-1 used in conjunction with the cooling and shakeout, at least once daily when each of the above listed processes is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse CD-1 shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (5) An inspection shall be performed each calendar quarter of all bags controlling the cooling and shakeout process when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (6) In the event that bag failure has been observed:
 - (1) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.
 - (2) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion
- (7) The Permittee shall maintain records of the results of the baghouse inspections.

These monitoring conditions are necessary to ensure that each process complies with 326 IAC 2-2 (PSD).

The Hunter #2 pouring, cooling, and shakeout processes have applicable compliance monitoring conditions as specified below:

- (1) Within 180 days after issuance of this permit, the Permittee shall perform PM testing on the Hunter #2 pouring, cooling, and shakeout processes using methods as approved by the Commissioner, in order to demonstrate compliance with the PSD limits specified in this permit. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.
- (2) Daily visible emissions notations of the baghouse CD-1 stack exhaust shall be performed during normal daylight operations when the cooling and shakeout are in operation. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (3) The Permittee shall maintain records of the daily visible emission notations of the baghouse CD-1 stack exhaust.
- (4) The Permittee shall record the total static pressure drop across the baghouse CD-1 used in conjunction with the cooling and shakeout, at least once daily when each of the above listed processes is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse CD-1 shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (5) An inspection shall be performed each calendar quarter of all bags controlling the cooling and shakeout process when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (6) In the event that bag failure has been observed:
 - (1) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.
 - (2) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion

- (7) The Permittee shall maintain records of the results of the baghouse inspections.

These monitoring conditions are necessary to ensure that each process complies with 326 IAC 2-2 (PSD).

Compliance Monitoring - The Disa pouring, cooling, and shakeout processes

The Disa pouring, cooling, and shakeout processes have applicable compliance monitoring conditions as specified below:

- (1) Within 180 days after issuance of this permit, the Permittee shall perform PM testing on the Disa pouring, cooling, and shakeout processes using methods as approved by the Commissioner, in order to demonstrate compliance with the PSD limits specified in this permit. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.
- (2) Daily visible emissions notations of the Disa pouring, cooling, and shakeout stack exhausts shall be performed during normal daylight operations when the sand system is in operation. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (3) The Permittee shall maintain records of the daily visible emission notations of the stack exhaust.

These monitoring conditions are necessary to ensure that each process complies with 326 IAC 2-2 (PSD).

Compliance Monitoring - The sand system, controlled by baghouse CD1

The baghouse controlling the sand system has applicable compliance monitoring conditions as specified below:

- (1) Daily visible emissions notations of the baghouse CD-1 stack exhaust shall be performed during normal daylight operations when the sand system is in operation. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for

this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

- (2) The Permittee shall maintain records of the daily visible emission notations of the baghouse CD-1 stack exhaust.
- (3) The Permittee shall record the total static pressure drop across the baghouse CD-1 used in conjunction with the sand system, at least once daily when each of the above listed processes is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse CD-1 shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (4) An inspection shall be performed each calendar quarter of all bags controlling the sand handling process when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (5) In the event that bag failure has been observed:
 - (1) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.
 - (2) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion
- (6) The Permittee shall maintain records of the results of the baghouse inspections.
- (7) Within 180 days after issuance of this permit, stack tests shall be performed on the baghouse controlling the sand system for PM emissions. These tests shall be repeated at least once every five years.

These monitoring conditions are necessary because the baghouse controlling the sand handling process must operate properly to ensure that the process complies with 326 IAC 6-3 (Process Operations) and/or 326 IAC 2-2 (PSD).

Compliance Monitoring - Isocure Core Machines, ISO-1, ISO-2, and ISO-3

The Isocure Core Machines ISO-1, ISO-2, and ISO-3 have applicable compliance monitoring conditions as specified below:

- (1) The Permittee shall maintain records of the monthly resin usage from these three core machines. Quarterly reports shall be submitted to the OAM. These reports shall include the monthly core production from these three core machines in tons of cores per month.

Compliance Monitoring - Isocure Core Machines, ISO-6, ISO-7, and ISO-8

The Isocure Core Machines ISO-6, ISO-7, and ISO-8 have applicable compliance monitoring conditions as specified below:

- (1) The Permittee shall maintain records of the monthly resin usage from these three core machines. Quarterly reports shall be submitted to the OAM. These reports shall include the monthly core production from these three core machines in tons of cores per month.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations.

Conclusion

The operation of this aluminum foundry shall be subject to the conditions of the attached proposed Part 70 Permit No. T003-6027-00070.

Potential Emissions

Appendix A: Emission Calculations

Company Name: Fort Wayne Foundry - Pontiac Division, Inc.
 Plant Location: 2509 East Pontiac Street, Fort Wayne, Indiana 46803
 County: Allen
 Permit Reviewer: Nisha Sizemore
 Title V #: 003-6027
 Plt. ID #: 003-00070

** Process Emissions **

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Scrap and Charge	9.75	PM	0.6	21.02	21.02	none	
Handling		PM-10	0.36	12.61	12.61		
SCC# 3-04-003-15		SO2	0	0	0		
AP-42 Ch. 12.10		NOx	0	0	0		
		VOC	0	0	0		
		CO	0	0	0		
		Lead	0	0	0		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 9.75 tons/hr

limit = $4.1 \times (9.75^{0.67}) = 18.85 \text{ lb/hr}$ (allowable)

with potential:

$21.02 \text{ tons/yr} \times 2000 \text{ lb/ton} / 8760 \text{ hr/yr} = 4.80 \text{ lb/hr}$ (will comply)

Fort Wayne Foundry - Pontiac Division, Inc.
Fort Wayne, Indiana

T 003-6027
Plt ID 003-00070

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Melting - (1) Reverb. Furnace	2.5	PM	0.50	5.48	5.48	none	
Disa #1		PM-10	0.50	5.48	5.48		
		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
EPA SCC# 3-04-001-03		VOC	0.20	2.19	2.19		
AP-42 Ch. 12.10		CO	0.00	0.00	0.00		
		Lead	0.00	0.00	0.00		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 2.5 tons/hr

limit = $4.1 \times (2.5^{0.67}) = 7.6 \text{ lb/hr}$ (allowable)

with potential:

$5.5 \text{ tons/yr} \times 2000 \text{ lb/ton} / 8760 \text{ hr/yr} = 1.3 \text{ lb/hr}$ (will comply)

Fort Wayne Foundry - Pontiac Division, Inc.
Fort Wayne, Indiana

T 003-6027
Plt ID 003-00070

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Melting - Reverb. Furnace Disa #2	1.75	PM	0.50	3.83	3.83	none	
		PM-10	0.50	3.83	3.83		
		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
EPA SCC# 3-04-001-03		VOC	0.20	1.53	1.53		
AP-42 Ch. 12.10		CO	0.00	0.00	0.00		
		Lead	0.00	0.00	0.00		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

$$P = 1.75 \text{ tons/hr}$$

$$\text{limit} = 4.1 \times (1.75^{0.67}) = 6.0 \text{ lb/hr} \quad (\text{allowable})$$

with potential:

$$3.8 \text{ tons/yr} \times 2000 \text{ lb/ton} / 8760 \text{ hr/yr} = 0.9 \text{ lb/hr} \quad (\text{will comply})$$

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Melting - Reverb. Furnace	1.75	PM	0.50	3.83	3.83	none	
		PM-10	0.50	3.83	3.83		
		SO2	0.00	0.00	0.00		
Hunter #1		NOx	0.00	0.00	0.00		
EPA SCC# 3-04-001-03		VOC	0.20	1.53	1.53		
AP-42 Ch. 12.10		CO	0.00	0.00	0.00		
		Lead	0.00	0.00	0.00		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

$$P = 1.75 \text{ tons/hr}$$

$$\text{limit} = 4.1 \times (1.75^{0.67}) = 6.0 \text{ lb/hr} \quad (\text{allowable})$$

with potential:

$$3.8 \text{ tons/yr} \times 2000 \text{ lb/ton} / 8760 \text{ hr/yr} = 0.9 \text{ lb/hr} \quad (\text{will comply})$$

Fort Wayne Foundry - Pontiac Division, Inc.
Fort Wayne, Indiana

T 003-6027
Plt ID 003-00070

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Melting - Reverb. Furnace	1.5	PM	0.50	3.29	3.29	none	
		PM-10	0.50	3.29	3.29		
		SO2	0.00	0.00	0.00		
Hunter #2		NOx	0.00	0.00	0.00		
EPA SCC# 3-04-001-03		VOC	0.20	1.31	1.31		
AP-42 Ch. 12.10		CO	0.00	0.00	0.00		
		Lead	0.00	0.00	0.00		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 1.5 tons/hr

limit = $4.1 \times (1.5^{0.67}) = 5.4 \text{ lb/hr}$ (allowable)

with potential:

3.3 tons/yr x 2000 lb/ton / 8760 hr/yr = 0.8 lb/hr (will comply)

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Melting - Reverb. Furnace	2.25	PM	0.50	4.93	4.93	none	
		PM-10	0.50	4.93	4.93		
		SO2	0.00	0.00	0.00		
Hunter #3		NOx	0.00	0.00	0.00		
EPA SCC# 3-04-001-03		VOC	0.20	1.97	1.97		
AP-42 Ch. 12.10		CO	0.00	0.00	0.00		
		Lead	0.00	0.00	0.00		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 2.25 tons/hr

limit = $4.1 \times (2.25^{0.67}) = 7.1 \text{ lb/hr}$ (allowable)

with potential:

4.9 tons/yr x 2000 lb/ton / 8760 hr/yr = 1.1 lb/hr (will comply)

Fort Wayne Foundry - Pontiac Division, Inc.
Fort Wayne, Indiana

T 003-6027
Pit ID 003-00070

Process:	Rate (tons flux/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Fluxing - (5) Reverb. Furnaces	0.00415	PM	1000.00	18.18	18.18	none	
Disa #1 and #2		PM-10	532.00	9.67	9.67		
Hunter #1, #2, and #3		SO2	0.00	0.00	0.00		
EPA SCC# 3-04-001-03		NOx	0.00	0.00	0.00		
AP-42 Ch. 12.10		VOC	0.20	0.00	0.00		
		CO	0.00	0.00	0.00		
		Lead	0.00	0.00	0.00		
Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Pouring/Casting	2.25	PM	4.20	41.39	41.39	none	
SCC# 3-04-003-18		PM-10	2.06	20.30	20.30		
		SO2	0.02	0.20	0.20		
Hunter #1 pouring line		NOx	0.01	0.10	0.10		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates greater than 30 tons per hour:

P= 36 tons/hr Note: The process weight rate includes the weight of the castings and the metal.

limit = $55 \times (36^{0.11}) - 40 = 41.6 \text{ lb/hr}$ (allowable)

with potential:

$41.4 \text{ tons/yr} \times 2000 \text{ lb/ton} / 8760 \text{ hr/yr} = 9.5 \text{ lb/hr}$ (will comply)

Fort Wayne Foundry - Pontiac Division, Inc.
Fort Wayne, Indiana

T 003-6027
Pit ID 003-00070

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Pouring/Casting	2.25	PM	4.20	41.39	41.39	none	
SCC# 3-04-003-18		PM-10	2.06	20.30	20.30		
		SO2	0.02	0.20	0.20		
Hunter #2 pouring line		NOx	0.01	0.10	0.10		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates greater than 30 tons per hour:

P= 36 tons/hr Note: The process weight rate includes the weight of the castings and the metal.

limit = $55 \times (36^{0.11}) - 40 = 41.6 \text{ lb/hr}$ (allowable)

with potential:

41.4 tons/yr x 2000 lb/ton / 8760 hr/yr = 9.5 lb/hr (will comply)

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Pouring/Casting	4.3	PM	4.20	78.18	78.18	none	
SCC# 3-04-003-18		PM-10	2.06	38.35	38.35		
		SO2	0.02	0.37	0.37		
Disa pouring line		NOx	0.01	0.19	0.19		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates greater than 30 tons per hour:

P= 68 tons/hr Note: The process weight rate includes the weight of the castings and the metal.

limit = $55 \times (68^{0.11}) - 40 = 47.5 \text{ lb/hr}$ (allowable)

with potential:

78.2 tons/yr x 2000 lb/ton / 8760 hr/yr = 17.9 lb/hr (will comply)

Fort Wayne Foundry - Pontiac Division, Inc.
Fort Wayne, Indiana

T 003-6027
Pit ID 003-00070

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Castings Cooling	4.25	PM	1.40	26.06	26.06		
SCC# 3-04-003-25		PM-10	1.40	26.06	26.06		
Disa Line							

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates greater than 30 tons per hour:

P= 68 tons/hr Note: The process weight rate includes the weight of the castings and the metal.

limit = $55 \times (68^{0.11}) - 40 = 47.5 \text{ lb/hr}$ (allowable)

with potential:

26.1 tons/yr x 2000 lb/ton / 8760 hr/yr = 5.9 lb/hr (will comply)

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Castings Cooling	2.25	PM	1.40	13.80	13.80		
SCC# 3-04-003-25		PM-10	1.40	13.80	13.80		
Hunter Line #1							

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates greater than 30 tons per hour:

P= 36 tons/hr Note: The process weight rate includes the weight of the castings and the metal.

limit = $55 \times (36^{0.11}) - 40 = 41.6 \text{ lb/hr}$ (allowable)

with potential:

13.8 tons/yr x 2000 lb/ton / 8760 hr/yr = 3.1 lb/hr (will comply)

Fort Wayne Foundry - Pontiac Division, Inc.
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Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Castings Cooling	2.25	PM	1.40	13.80	13.80		
SCC# 3-04-003-25		PM-10	1.40	13.80	13.80		
Hunter #2 Line		SO2	0.00	0.00	0.00		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates greater than 30 tons per hour:

P= 36 tons/hr Note: The process weight rate includes the weight of the castings and the metal.

limit = $55 \times (36^{0.11}) - 40 = 41.6 \text{ lb/hr}$ (allowable)

with potential:

$13.8 \text{ tons/yr} \times 2000 \text{ lb/ton} / 8760 \text{ hr/yr} = 3.1 \text{ lb/hr}$ (will comply)

Fort Wayne Foundry - Pontiac Division, Inc.
Fort Wayne, Indiana

T 003-6027
Plt ID 003-00070

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Castings Shakeout	2.25	PM	3.20	31.54	31.54		
Hunter Line #1		PM-10	2.24	22.08	22.08		
SCC# 3-04-003-31							
AP-42 Ch. 12.10							

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates greater than 30 tons per hour:

P= 36 tons/hr Note: The process weight rate includes the weight of the castings and the metal.

limit = $55 \times (36^{0.11}) - 40 = 41.6 \text{ lb/hr}$ (allowable)

with potential:

$31.5 \text{ tons/yr} \times 2000 \text{ lb/ton} / 8760 \text{ hr/yr} = 7.2 \text{ lb/hr}$ (will comply)

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Castings Shakeout	2.25	PM	3.20	31.54	31.54	none	
Hunter Line #2		PM-10	2.24	22.08	22.08		
SCC# 3-04-003-31							
AP-42 Ch. 12.10							

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates greater than 30 tons per hour:

P= 36 tons/hr Note: The process weight rate includes the weight of the castings and the metal.

limit = $55 \times (36^{0.11}) - 40 = 41.6 \text{ lb/hr}$ (allowable)

with potential:

$31.5 \text{ tons/yr} \times 2000 \text{ lb/ton} / 8760 \text{ hr/yr} = 7.2 \text{ lb/hr}$ (will comply)

Fort Wayne Foundry - Pontiac Division, Inc.
Fort Wayne, Indiana

T 003-6027
Pit ID 003-00070

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Castings Shakeout	4.25	PM	3.20	59.57	59.57	none	
Disa Line		PM-10	2.24	41.70	41.70		
SCC# 3-04-003-31							
AP-42 Ch. 12.10							

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates greater than 30 tons per hour:

P= 36 tons/hr Note: The process weight rate includes the weight of the castings and the metal.

limit = $55 \times (36^{0.11}) - 40 = 41.6 \text{ lb/hr}$ (allowable)

with potential:

$59.6 \text{ tons/yr} \times 2000 \text{ lb/ton} / 8760 \text{ hr/yr} = 13.6 \text{ lb/hr}$ (will comply)

Fort Wayne Foundry - Pontiac Division, Inc.
Fort Wayne, Indiana

T 003-6027
Plt ID 003-00070

Process:	Rate (tons sand/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Sand Handling	90	PM	3.6	1419.1	75.2	baghouse	94.70%
EPA SCC# 3-04-003-50		PM-10	0.54	212.9	11.3		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates greater than 30 tons per hour:

P= 90 tons/hr

limit = $55 \times (90^{0.11}) - 40 = 50.2 \text{ lb/hr}$ (allowable)

with potential:

$75.2 \text{ tons/yr} \times 2000 \text{ lb/ton} / 8760 \text{ hr/yr} = 17.2 \text{ lb/hr}$ (will comply)

Methodology:

Ef = Emission factor

Ebc = Potential Emissions before controls = Rate (units/hr) x Ef(lbs/unit) x 8760 hrs/yr / 2000 lbs/hr

Eac = Potential Emissions after controls = (1-efficiency/100) x Ebc

1 lb = 2000 tons

Company Name: Fort Wayne Foundry - Pontiac Division, Inc.
Address: Fort Wayne, Indiana
Permit Number: 003-6027

Process	6-3 limit (lbs/hr)	6-3 limit (tons/yr)	Limited Emissions PM (tons/yr)	Truncated 6-3 limits (lbs/hr)	Limited Emissions PM10 (tons/yr)	Truncated PM10 limits (lbs/hr)
Hunter #2 pouring	41.6	182.21	27.23	9.45	13.35	4.63
Hunter #2 cooling	41.6	182.21	9.08	3.15	9.08	3.15
Hunter #2 shakeout	41.6	182.21	20.74	7.20	14.52	5.04
sand handling	50.2	219.88	41.95	17.17	6.29	2.57
Total for 1977 construction	175	766.5	99	36.97	43.24	15.40
Hunter #1 pouring	41.6	182.21	10.31	9.45	5.06	4.64
Hunter #1 cooling	41.6	182.21	3.44	3.15	3.44	3.15
Hunter #1 shakeout	41.6	182.21	7.86	7.20	5.50	5.04
Total for 1981 construction:	124.8	546.6	21.6	19.8	14.0	12.8
Disa pouring	47.5	208.05	9.48	9.45	4.65	4.63
Disa cooling	47.5	208.05	3.16	3.15	3.16	3.15
Disa shakeout	47.5	208.05	7.23	7.20	5.06	5.04
Disa #1 furnace	7.6	33.29	0.67	1.13	0.67	1.13
Disa #2 furnace	6	26.28	0.46	1.13	0.46	1.13
Total for 1986 construction:	156.1	683.7	21.0	22.1	14.0	15.1

Metal throughput limit for Hunter #2 pouring, cooling, and shakeout:
12,965 tons/yr / 2.25 tons/hr = 5762 hrs/yr

Sand throughput limit for sand system:
439752 tons/yr / 90 tons/hr = 4886 hrs/yr

Metal throughput limit for Hunter #1 pouring, cooling, and shakeout:
4,910.86 tons/yr / 2.25 tons/hr = 2183 hrs/yr

Metal throughput limit for Disa pouring, cooling, and shakeout:
4,515.78 tons/yr / 2.25 tons/hr = 2007 hrs/yr

Metal throughput limit for Disa #1 furnace:
2,676.18 tons/yr / 2.25 tons/hr = 1189 hrs/yr

Metal throughput limit for Disa #2 furnace:
1,839.60 tons/yr / 2.25 tons/hr = 818 hrs/yr

Company Name: Fort Wayne Foundry - Pontiac Division, Inc.
 Address: Fort Wayne, Indiana
 Permit Number: 003-6027

Process	Limited Emissions VOC (tons/yr)	Truncated VOC limits (lbs/hr)
Disa pouring, cooling, shakeout	0.51	0.53
Isocure core machines 1, 2, and 3	38.04	39.87
Disa #1 furnace	0.27	0.28
Disa #2 furnace	0.18	0.19
Total for 1986 construction	39.00	40.88
Hunter #1 furnace	1.53	1.62
core machines 4 and 5	37.47	39.74
Total for 1990 construction:	39.0	41.4
Hunter #3 furnace	1.97	2.12
core machines 6, 7, and 8	37.03	39.84
Total for 1994 construction:	39.0	42.0

Resin throughput limit for core machines 1, 2, and 3:
 187 tons/yr / 0.0977925 tons/hr = 1908 hrs/yr

Resin throughput limit for core machines 4 and 5
 184 tons/yr / 0.0977925 tons/hr = 1886 hrs/yr

Resin throughput limit for core machines 6, 7, and 8
 182 tons/yr / 0.0977925 tons/hr = 1859 hrs/yr

Limited Emissions

Appendix A: Emission Calculations

Company Name: Fort Wayne Foundry - Pontiac Street Division
 Plant Location: 2509 East Pontiac Street, Fort Wayne, Indiana 46803
 County: Allen
 Permit Reviewer: Nisha Sizemore
 Title V #: 003-6027
 Plt. ID #: 003-00070

* * Process Emissions * *

Binder System Used: Phenolic Urethane

Rate (tons Al/hr)	Usage (lbs resin/ton cores)	Production (ton cores/ton metal)
0.56	20	1.003

Hunter #2 Line

Process:	Binder Usage (lbs resin/hr)	Pollutant	Ef (lb/lb resin)	Ebc (ton/yr)
Pouring/Cooling and Shakeout	11.2	VOC	0.023377	1.15
		Benzene	0.005351	0.26
		Formaldehyde	0.000022	0.00
		Xylene	0.000571	0.03
		Phenol	0.003904	0.19
		Toluene	0.000833	0.04
		Napthalene	0.000022	0.00
		Acrolein	0.000031	0.00
		Total HAPs		0.53

Fort Wayne Foundry - Pontiac Street Division
2509 East Pontiac Street, Fort Wayne, Indiana 46803

Title V #: 003-6027
Plt. ID #: 003-00070

Binder Composition	VOC composition	Weight percent	Percent Evaporates	Rate (lb VOC/lb compon)	Usage (lb compon/lb resin)	Production (lb VOC/lb resin)
Part 1	phenol	3%	0%	0.000	0.55	0.00
	volatiles	18%	50%	0.090	0.55	0.05
Part 2	volatiles	24%	50%	0.120	0.45	0.05
	TEA	100%	100%	1.000	0.10	0.10

Process:	Binder Usage (lbs resin/hr)	Pollutant	Ebc (ton/yr)	Emissions per core machine (ton/yr)
Core Making	11.2	VOC	10.023573	1.25
		TEA	4.925589	0.62
		Benzene	0.005351	0.00
		Formaldehyde	0.000022	0.00
		Xylene	0.000571	0.00
		Phenol	0.003904	0.00
		Toluene	0.000833	0.00
		Napthalene	0.000022	0.00
		Acrolein	0.000031	0.00
		Total HAPs	4.936323	0.62

Process:	Binder Usage (lbs resin/hr)	Pollutant	Ebc (ton/yr)
Core Making	41.5	VOC	37.0
		TEA	18.2
ISO-6, ISO-7, and ISO-8 limited emissions		Benzene	0.0
		Formaldehyde	0.0
		Xylene	0.0
		Phenol	0.0
		Toluene	0.0
		Napthalene	0.0
		Acrolein	0.0
		Total HAPs	18.2

resin limit: 41.5 lb/hr x 8760 hr/yr / 2000 lb/ton = 181.77 tons resin/yr

Methodology:

Ef = Emission factor

Ebc = Potential Emissions before controls = Rate (units/hr) x Ef(lbs/unit) x 8760 hrs/yr / 2000 lbs/hr

Limited Emissions

Appendix A: Emission Calculations

Company Name: Fort Wayne Foundry - Pontiac Street Division
 Plant Location: 2509 East Pontiac Street, Fort Wayne, Indiana 46803
 County: Allen
 Permit Reviewer: Nisha Sizemore
 Title V #: 003-6027
 Plt. ID #: 003-00070

* * Process Emissions * *

Binder System Used: Phenolic Urethane

Rate (tons Al/hr)	Usage (lbs resin/ton cores)	Production (ton cores/ton metal)
1.48	20	1.003

Hunter #1 Line

Process:	Binder Usage (lbs resin/hr)	Pollutant	Ef (lb/lb resin)	Ebc (ton/yr)
Pouring/Cooling and Shakeout	29.7	VOC	0.023377	3.04
		Benzene	0.005351	0.70
		Formaldehyde	0.000022	0.00
		Xylene	0.000571	0.07
		Phenol	0.003904	0.51
		Toluene	0.000833	0.11
		Napthalene	0.000022	0.00
		Acrolein	0.000031	0.00
		Total HAPs		1.40

Fort Wayne Foundry - Pontiac Street Division
2509 East Pontiac Street, Fort Wayne, Indiana 46803

Title V #: 003-6027
Plt. ID #: 003-00070

Binder Composition	VOC composition	Weight percent	Percent Evaporates	Rate (lb VOC/lb compon)	Usage (lb compon/lb resin)	Production (lb VOC/lb resin)
Part 1	phenol	3%	0%	0.000	0.55	0.00
	volatiles	18%	50%	0.090	0.55	0.05
Part 2	volatiles	24%	50%	0.120	0.45	0.05
	TEA	100%	100%	1.000	0.10	0.10

Process:	Binder Usage (lbs resin/hr)	Pollutant	Ebc (ton/yr)	Emissions per core machine (ton/yr)
Core Making	29.7	VOC	26.462518	3.31
		TEA	13.003694	1.63
		Benzene	0.005351	0.00
		Formaldehyde	0.000022	0.00
		Xylene	0.000571	0.00
		Phenol	0.003904	0.00
		Toluene	0.000833	0.00
		Napthalene	0.000022	0.00
		Acrolein	0.000031	0.00
		Total HAPs	13.014428	1.63

Process:	Binder Usage (lbs resin/hr)	Pollutant	Ebc (ton/yr)
Core Making	42.1	VOC	37.5
		TEA	18.4
ISO-4 and ISO-5 limited emissions		Benzene	0.0
		Formaldehyde	0.0
		Xylene	0.0
		Phenol	0.0
		Toluene	0.0
		Napthalene	0.0
		Acrolein	0.0
		Total HAPs	18.5

resin limit: 42.1 lb/hr x 8760 hr/yr / 2000 lb/ton = 184.40 tons resin/yr

Methodology:

Ef = Emission factor

Ebc = Potential Emissions before controls = Rate (units/hr) x Ef(lbs/unit) x 8760 hrs/yr / 2000 lbs/hr

Limited Emissions
Disa Line

Appendix A: Emission Calculations

Company Name: Fort Wayne Foundry - Pontiac Street Division
Plant Location: 2509 East Pontiac Street, Fort Wayne, Indiana 46803
County: Allen
Permit Reviewer: Nisha Sizemore
Title V #: 003-6027
Plt. ID #: 003-00070

* * Process Emissions * *

Binder System Used: Phenolic Urethane

Rate (tons Al/hr)	Usage (lbs resin/ton cores)	Production (ton cores/ton metal)
0.52	20	1.003

Process:	Binder Usage (lbs resin/hr)	Pollutant	Ef (lb/lb resin)	Ebc (ton/yr)	Ebc for Disa line (ton/yr)
Pouring/Cooling and Shakeout	10.3	VOC	0.023377	1.06	0.51
		Benzene	0.005351	0.24	0.12
		Formaldehyde	0.000022	0.00	0.00
		Xylene	0.000571	0.03	0.01
		Phenol	0.003904	0.18	0.09
		Toluene	0.000833	0.04	0.02
		Napthalene	0.000022	0.00	0.00
		Acrolein	0.000031	0.00	0.00
		Total HAPs		0.49	0.24

Fort Wayne Foundry - Pontiac Street Division
2509 East Pontiac Street, Fort Wayne, Indiana 46803

Title V #: 003-6027
Plt. ID #: 003-00070

Binder Composition	VOC composition	Weight percent	Percent Evaporates	Rate (lb VOC/lb compon)	Usage (lb compon/lb resin)	Production (lb VOC/lb resin)
Part 1	phenol	3%	0%	0.000	0.55	0.00
	volatiles	18%	50%	0.090	0.55	0.05
Part 2	volatiles	24%	50%	0.120	0.45	0.05
	TEA	100%	100%	1.000	0.10	0.10

Process:	Binder Usage (lbs resin/hr)	Pollutant	Ebc (ton/yr)	Emissions per core machine (ton/yr)
Core Making	10.3	VOC	9.217181	1.15
		TEA	4.529327	0.57
		Benzene	0.005351	0.00
		Formaldehyde	0.000022	0.00
		Xylene	0.000571	0.00
		Phenol	0.003904	0.00
		Toluene	0.000833	0.00
		Napthalene	0.000022	0.00
		Acrolein	0.000031	0.00
		Total HAPs	4.540061	0.57

Process:	Binder Usage (lbs resin/hr)	Pollutant	Ebc (ton/yr)
Core Making	42.6	VOC	38.0
		TEA	18.7
ISO-1, ISO-2, and ISO-3		Benzene	0.0
limited emissions		Formaldehyde	0.0
		Xylene	0.0
		Phenol	0.0
		Toluene	0.0
		Napthalene	0.0
		Acrolein	0.0
		Total HAPs	18.7

resin limit: 42.6 lb/hr x 8760 hr/yr / 2000 lb/ton = 186.59 tons resin/yr

Methodology:

Ef = Emission factor

Ebc = Potential Emissions before controls = Rate (units/hr) x Ef(lbs/unit) x 8760 hrs/yr / 2000 lbs/hr

Potential Emissions

Appendix A: Emission Calculations

Company Name: Fort Wayne Foundry - Pontiac Street Division
 Plant Location: 2509 East Pontiac Street, Fort Wayne, Indiana 46803
 County: Allen
 Permit Reviewer: Nisha Sizemore
 Title V #: 003-6027
 Plt. ID #: 003-00070

* * Process Emissions * *

Binder System Used: Phenolic Urethane

Rate (tons Al/hr)	Usage (lbs resin/ton cores)	Production (ton cores/ton metal)
9.8	20	1.003

Process:	Binder Usage (lbs resin/hr)	Pollutant	Ef (lb/lb resin)	Ebc (ton/yr)
Pouring/Cooling and Shakeout	195.6	VOC	0.023377	20.03
		Benzene	0.005351	4.58
		Formaldehyde	0.000022	0.02
		Xylene	0.000571	0.49
		Phenol	0.003904	3.34
		Toluene	0.000833	0.71
		Napthalene	0.000022	0.02
		Acrolein	0.000031	0.03
		Total HAPs		9.20

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Binder Composition	VOC composition	Weight percent	Percent Evaporates	Rate (lb VOC/lb compon)	Usage (lb compon/lb resin)	Production (lb VOC/lb resin)
Part 1	phenol	3%	0%	0.000	0.55	0.00
	volatiles	18%	50%	0.090	0.55	0.05
Part 2	volatiles	24%	50%	0.120	0.45	0.05
	TEA	100%	100%	1.000	0.10	0.10

Process:	Binder Usage (lbs resin/hr)	Pollutant	Ebc (ton/yr)	Emissions per core machine (ton/yr)
Core Making	195.6	VOC	174.330778	19.37
		TEA	85.666230	9.52
		Benzene	0.005351	0.00
		Formaldehyde	0.000022	0.00
		Xylene	0.000571	0.00
		Phenol	0.003904	0.00
		Toluene	0.000833	0.00
		Napthalene	0.000022	0.00
		Acrolein	0.000031	0.00
		Total HAPs	85.676964	9.52

Process:	Binder Usage (lbs resin/hr)	Pollutant	Ebc (ton/yr)
Core Making	43.7	VOC	39.0
		TEA	19.1
ISO-1 and ISO-2 limited emissions		Benzene	0.0
		Formaldehyde	0.0
		Xylene	0.0
		Phenol	0.0
		Toluene	0.0
		Napthalene	0.0
		Acrolein	0.0
		Total HAPs	19.2

resin limit: 43.7 lb/hr x 8760 hr/yr / 2000 lb/ton = 191.41 tons resin/yr

Methodology:

Ef = Emission factor

Ebc = Potential Emissions before controls = Rate (units/hr) x Ef(lbs/unit) x 8760 hrs/yr / 2000 lbs/hr

Company Name: Fort Wayne Foundry - Pontiac Division, Inc.
 Plant Location: 2509 East Pontiac Street, Fort Wayne, Indiana 46803
 County: Allen
 Permit Reviewer: Nisha Sizemore
 Title V #: 003-6027
 Plt. ID #: 003-00070

* * Process Emissions * *

In 1976, six furnaces were constructed.

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Melting - (2) electric induction furnace rated at 1 ton/hr each	2	PM PM-10	4.30 2.60	37.67 22.78	37.67 22.78	none	
EPA SCC# 3-04-001-03 AP-42 Ch. 12.10		326 IAC 6-3-2 allowable is 4.10 lbs/hr which equals 17.96 tons per year per furnace. PM limit is	35.92	tons/year			

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Melting - (1) electric induction furnace rated at 500 lbs/hr	0.25	PM PM-10	4.30 2.60	4.71 2.85	4.71 2.85	none	
EPA SCC# 3-04-001-03 AP-42 Ch. 12.10							

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Melting - (3) electric induction crucible furnaces rated at 1000 lbs/hr each EPA SCC# 3-04-001-03 AP-42 Ch. 12.10	1.5	PM PM-10	1.90 1.70	12.48 11.17	12.48 11.17	none	

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Total emissions from 1976 construction:

PM 53.11
PM-10 36.79

The source was still an existing minor source after the 1976 construction.

In 1977 the Hunter #2 pouring, cooling and shakeout line and the sand handling operation were constructed without a permit.

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Pouring/Casting	2.25	PM	0.5	4.93	4.93	none	
SCC# 3-04-003-18		PM-10	0.5	4.93	4.93		
		SO2	0.02	0.20	0.20		
Hunter #2 pouring line		NOx	0.01	0.10	0.10		

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Castings Cooling	2.25	PM	1	9.86	0.69	baghouse CD-1	0.93
SCC# 3-04-003-25		PM-10	1	9.86	0.69		0.93
Hunter #2 Line		SO2	0	0	0		

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Castings Shakeout	2.25	PM	3.2	31.54	11.67	baghouse CD-1	0.63
Hunter Line #2		PM-10	2.24	22.08	8.17		0.63
SCC# 3-04-003-31		VOC	0.469	4.62	4.62		
AP-42 Ch. 12.10							

Process:	Rate (tons sand/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Sand Handling	90	PM	3.6	1419.12	11.35	baghouse	99.20%
EPA SCC# 3-04-003-50		PM-10	0.54	212.868	11.28	baghouse	94.70%

Total emissions for the 1977 construction:

Cumulative Emissions

tons/yr
PM 28.64
PM-10 25.07
VOC 4.62

tons/yr
PM 81.75
PM-10 61.86
VOC 4.62

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In 1981 the Hunter #1 pouring, cooling and shakeout line was constructed without a permit.

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Pouring/Casting	2.25	PM	0.5	4.93	4.93	none	
SCC# 3-04-003-18		PM-10	0.5	4.93	4.93		
		SO2	0.02	0.20	0.20		
Hunter #1 pouring line		NOx	0.01	0.10	0.10		

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Castings Cooling	2.25	PM	1	9.86	0.69	baghouse CD-1	0.93
SCC# 3-04-003-25		PM-10	1	9.86	0.69		0.93
Hunter #1 Line		SO2	0	0.00	0.00		

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Castings Shakeout	2.25	PM	3.2	31.54	11.67	baghouse CD-1	0.63
Hunter Line #1		PM-10	2.24	22.08	8.17		0.63
SCC# 3-04-003-31		VOC	0.469	4.62	4.62		
AP-42 Ch. 12.10							

Total emissions for the 1981 construction:

Cumulative Emissions

tons/yr
PM 17.29
PM-10 13.79
VOC 4.62

tons/yr
PM 99.04
PM-10 75.64
VOC 9.24

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In 1986 the two Disa furnaces, the Disa pouring, cooling, and shakeout processes, and Isocure core machines #1, #2, and #3 were constructed without a permit.

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Melting - (1) Reverb. Furnace	2.5	PM	0.50	5.48	5.48	none	
Disa #1		PM-10	0.50	5.48	5.48		
		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
EPA SCC# 3-04-001-03		VOC	0.20	2.19	2.19		
AP-42 Ch. 12.10		CO	0.00	0.00	0.00		
		Lead	0.00	0.00	0.00		

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Melting - Reverb. Furnace	1.75	PM	0.50	3.83	3.83	none	
Disa #2		PM-10	0.50	3.83	3.83		
		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
EPA SCC# 3-04-001-03		VOC	0.20	1.53	1.53		
AP-42 Ch. 12.10		CO	0.00	0.00	0.00		
		Lead	0.00	0.00	0.00		

Process:	Rate (tons cores/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Coremaking machines #1, #2, and #3	2.25	PM	0.00	0.00	0.00	For detailed calculations for VOCs from coremaking, refer to the spreadsheet submitted by the applicant.	
		PM-10	0.00	0.00	0.00		
		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
EPA SCC# 3-04-001-03		VOC	---	57.10	57.10		
AP-42 Ch. 12.10		CO	0.00	0.00	0.00		
		Lead	0.00	0.00	0.00		

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Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Pouring/Casting	4.25	PM	0.50	9.31	9.31	none	
SCC# 3-04-003-18		PM-10	0.50	9.31	9.31		

Disa pouring line

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Castings Cooling	4.25	PM	1.00	18.62	18.62		
SCC# 3-04-003-25		PM-10	1.00	18.62	18.62		
Disa Line							

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Castings Shakeout	4.25	PM	3.20	59.57	59.57	none	
Disa Line		PM-10	2.24	41.70	41.70		
SCC# 3-04-003-31							
AP-42 Ch. 12.10							

Total emissions for the 1986 construction:

Cumulative Emissions

	tons/yr
PM	96.80
PM-10	78.93
SO2	0.00
NOx	0.00
VOC	60.82
CO	0.00
Lead	0.00

	tons/yr
PM	195.83
PM-10	154.57
VOC	70.07

Since potential VOC emissions were greater than 25 tons/yr, a construction permit was required for these facilities.

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In 1990 the Hunter #1 furnace and Isocure core machines #4 and #5 were constructed without a permit.

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Melting - Reverb. Furnace	1.75	PM	3.13	23.99	23.99	none	
		PM-10	1.83	14.03	14.03		
		SO2	0.00	0.00	0.00		
Hunter #1		NOx	0.00	0.00	0.00		
EPA SCC# 3-04-001-03		VOC	0.20	1.53	1.53		
AP-42 Ch. 12.10		CO	0.00	0.00	0.00		
		Lead	0.00	0.00	0.00		

Process:	Rate (tons cores/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Coremaking machines #4 and #5	1.5	PM	0.00	0.00	0.00	none	
		PM-10	0.00	0.00	0.00		
		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
EPA SCC# 3-04-001-03		VOC	---	38.07	38.07	For detailed calculations for VOCs from coremaking, refer to the	
AP-42 Ch. 12.10		CO	0.00	0.00	0.00	spreadsheet submitted by	
		Lead	0.00	0.00	0.00	the applicant.	

Total emissions for the 1990 construction:

	tons/yr	
PM	23.99	Note: PM and PM10 emissions from the furnace must comply with the emission factors used above, in order that PSD shall not app
PM-10	14.03	
SO2	0.00	
NOx	0.00	
VOC	39.60	
CO	0.00	
Lead	0.00	

Since potential VOC emissions were greater than 25 tons/yr, a construction permit was required for these facilities.
A limit to render the requirements of 326 IAC 2-2 (PSD) not applicable would also have been required since VOC emissions are greater than 40 tons/yr.

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In 1992 the Hunter #2 furnace was constructed without a permit.

Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Melting - Reverb. Furnace	1.5	PM	3.65	23.98	23.98	none	
		PM-10	2.13	14.00	14.00		
		SO2	0.00	0.00	0.00		
Hunter #2		NOx	0.00	0.00	0.00		
EPA SCC# 3-04-001-03		VOC	0.20	1.31	1.31		
AP-42 Ch. 12.10		CO	0.00	0.00	0.00		
		Lead	0.00	0.00	0.00		

Note: PM and PM10 emissions must comply with the emission factors used above, in order that PSD shall not apply.

